

Local Development Plan 2030 Preferred Options Paper Consultation

Report on Representations Received

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1.0 INTRODUCTION

1.1 The Preferred Options Paper (POP) is the first public consultation stage in the preparation of the Council's Local Development Plan (LDP). It identifies key issues of strategic importance that need to be addressed in the Plan. It also examines a range of possible options to address these issues, including the Council's 'preferred options'. It seeks to stimulate wide-ranging yet focussed debate.

1.2 This report has been prepared to provide a detailed summary of the key issues raised in response to the POP. The publication of this report is not a legislative requirement, however, the Council considers it to be good practice.

2.0 PURPOSE OF THE CONSULTATION REPORT

2.1 The Consultation Report will facilitate the Council's compliance with Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 (the 'LDP Regs'), which states that, *'A council must take account of any representations made in accordance with paragraph (2) before it prepares a development plan document'*.

Consultation Report (Summary)

2.2 The report represents a detailed summary of the POP representations received. It does not, at this stage, analyse their content, nor does it suggest possible policy approaches, as to do so requires further evidence gathering and consultation. The report is published for information purposes only. It will be sent to neighbouring Councils' for information and to highlight any cross boundary issues. A full analysis of the representations received (within the specified timeframe) will be presented in the final POP Consultation Report.

Consultation Report (Final)

2.3 This subsequent report will be an amalgamation of this summary report and an analysis of the representations received, and how the Council has considered these in the preparation of its Plan.

3.0 CONSULTATION PROCESS

3.1 The consultation period for the POP commenced on the 26th June 2018, the same date on which it was formally launched and published. The 12 week consultation period ended at 5.00pm on the 21st September 2018. This time scale is in line with Regulation 11(3) of the LDP Regs, which states that the consultation period *‘must be a period of not less than 8 weeks or more than 12 weeks’*.

3.2 A Sustainability Appraisal/SEA (Scoping and Interim Reports) and an Equality Screening: Interim Progress Report were prepared in tandem with the POP and published for comment.

Statutory Consultation

3.3 As required under Regulation 9 of the LDP Regs the Council issued pre-POP consultation to the consultation bodies listed in these regulations, as follows:

- Northern Ireland Government Departments;
- Adjoining Councils;
- Water or Sewerage Undertaker;
- Northern Ireland Housing Executive;
- Civil Aviation Authority;
- Electronic Communication Code Operators;
- Electricity Licence Operators; and
- Gas licence Operators.

3.4 As required under Regulation 10 of the LDP Regs the Council also issued post-POP consultation to these bodies. Pre and post POP publication meetings were held with all adjoining Councils.

Launch Event

3.5 The Council held a launch event in the evening of Tuesday 26th June 2018 in Cloonavin, Coleraine. The event was attended by the Vice Chair of the Planning Committee, Elected Members, the Council’s Chief Executive, Head of Planning and other council officers, statutory consultees, adjoining council representatives and a number of architects/planning consultants. All attendees were offered a copy of the POP and Council planning officers were available to answer questions following the launch event.

Public Notice

3.6 A public notice was placed in “The Chronicle” newspaper for 2 consecutive weeks (w/c 25th June & 2nd July 2018) informing interested parties of the publication of the POP, dates and locations of public engagement events, details of when and where the documents could be viewed and the closing date for the submission of representations.

Press Release

3.7 A press release was launched on the Council's 'Latest News' section of its website on 26th June 2018. A press release also appeared in "The Chronicle" newspaper w/c 25th June 2018.

Council Website

3.8 The POP and associated documents were made available to view on the Council's Planning Section website on Tuesday 26th June 2018. An online questionnaire was available to assist interested parties with their submissions.

Social Media

3.9 The Council's Facebook page was updated on Tuesday 26th June 2018 to include news and details of the POP Publication. Updates were published on both Facebook and Twitter during the public engagement events.

Public Libraries

3.10 Hard copies of the POP (inc. Summary Document) and associated documents were made available in all (10) public libraries throughout the Borough. Public access to the internet was available in the libraries to view further documents online.

Local Planning Office

3.11 Hard copies of the POP (inc. Summary Document) and associated documents available to view at the local planning office. Members of the public also had access to the internet to view further documents online.

Elected Members

3.12 A letter issued to all 40 Elected Members, providing access links to the documents and inviting them to attend public engagement events and submit comments. In addition to this, those (16) Elected Members sitting on the LDP Steering Group (the Planning Committee) each received a hard copy of the POP.

Internal Communications

3.13 An e-mail issued to the Council's Chief Executive and three Directors inviting comment from staff from within each of the directorates. Separate e-mails issued to other key staff within the Council.

Public Engagement Events

3.14 Eight public engagement events were held throughout the Borough, comprising of one drop-in event in each of the 7 District Electoral Areas (DEAs) and one on Rathlin Island. A total of 50 members of the public attended these events. In addition to these, a total of 25 people attended the following consultation events:

- Youth Forum;
- Chambers of Commerce;
- Community Groups; and
- Older Adult and Aging Population.

3.15 Appendix 1 provides an overview of attendance numbers and main issues raised at each event. POP exhibition boards were displayed at all of the public engagement events. These provided an overview of the Borough (text and maps) and highlighted the key strategic issues, as well as the Council's 'preferred options' for addressing them. Hard copies of the POP and associated documents were made available to view at all events. Council planning officers were available to answer questions.

LDP "Register of Interest" Group

3.16 An update, advising of the launch of the POP and public engagement events, issued to all who had registered their interest on the Council's LDP online register.

Section 75 Groups

3.17 The 'Council Consultation' section of the Council's website was updated to include details of the POP consultation document. The Council wrote out to those listed on its Section 75 register, offering the opportunity for a one-to-one meeting with a planning officer. The POP was also presented to the Council's Equality Forum during the consultation period.

4.0 SUMMARY OF REPRESENTATIONS RECEIVED

Under the terms of Regulation 11(2)(a) of the LDP Regs “Any such representation must be – made within a period which the council specifies”. The specified period was from Tuesday 26th June to 5.00pm on Friday 21st September 2018 (inclusive). Overall, the Council received a total of 112 representations, 101 of which were received within the specified time (Table 1). The remaining 11 were received without the specified time (Tables 2) and therefore do not form part of this report. Table 3 sets out the nature of (all) representations received.

Table 1: Representations received within the 12 week consultation period.

Type of Respondents	Number Received
Agents/MLAs (representing clients/constituents)	66
Community groups/pressure groups (inc. industry)	11
Charities/partnership organisations	6
Government Departments/Agencies/Crown Estate/ Public Service implementation bodies/Stakeholders	12
Councils	4
Members of the public	1
Consultant (no named client)	1
Total	101

Table 2: Late representations received.

Type of Respondents	Number Received
Agents/MLAs (representing clients/constituents)	4
Community groups/pressure groups (inc. industry)	1
Government Departments/Agencies/Crown Estate/ Public Service implementation bodies/Stakeholders	6
Total	11

Table 3: Nature of Representation

Nature of Representation	Numbers Received
Questionnaire	17
Letter or e-mail	95
Total	112

The POP questionnaire contained 59 questions specific to the key issues and preferred options contained in the document, as well as the Sustainability Appraisal (Scoping and Interim Reports) and the opportunity to provide additional comments. A wide range of comments were received. A list of all respondents is attached at Appendix 2.

This section summarises the key considerations, organised into sub headings of:

- LDP Vision, Overarching Principles & Strategic Objectives
- Spatial Options & Comments;
- Social Options & Comments;
- Economy Options & Comments;
- Environment Options & Comments;
- Infrastructure Options & Comments:
- Key issues not addressed in the POP;
- Other matters not addressed in the POP
- Comments on Planning Policy Review;
- Comments on Sustainability Appraisal; and
- Comments on Equality Screening.

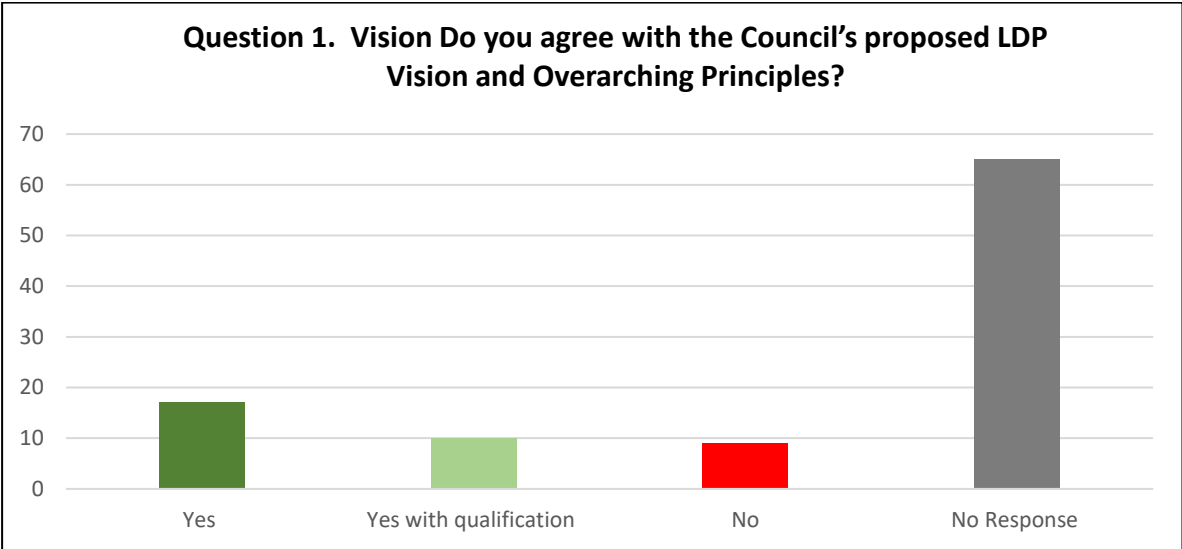
Representations received on Questions 1-58 of the POP are presented as follows:

- a graph to show the level of response to that particular question, followed by a summary of;
- DfI response¹; and
- responses from other contributors to the POP, including other statutory consultees.

¹ The Department for Infrastructure (DFI) has a key role in overseeing the production of LDP's. Their commentary will assist the Council in determining the most appropriate way forward in the production of the draft Plan Strategy to ensure a 'sound' Plan.

4.1 STRATEGIC ISSUES

4.1.1 LDP Vision and Overarching Principles



Summary of Dfl's Response:

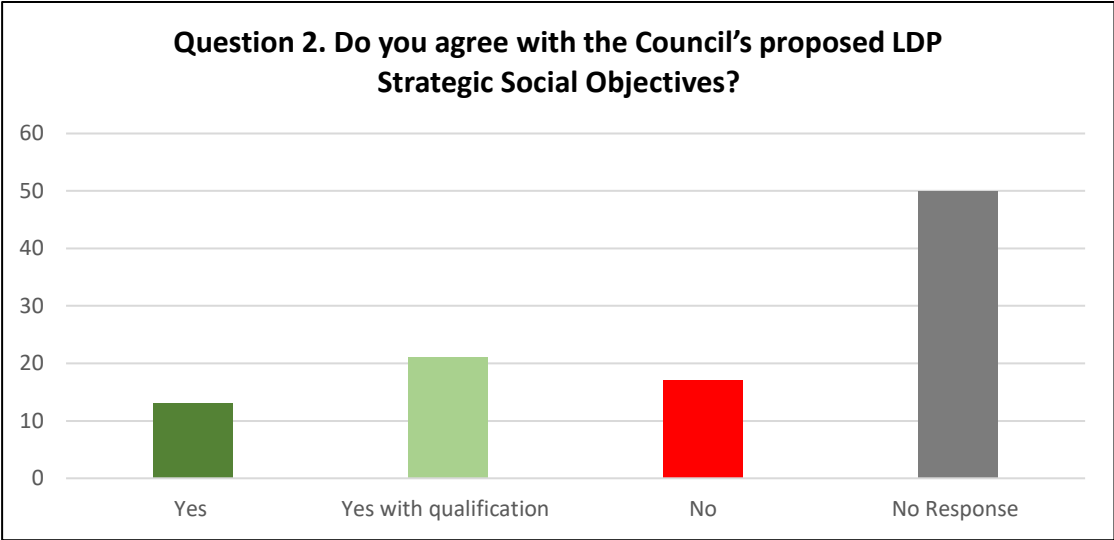
- Welcome recognition of close relationship between Community Plan and LDP. Vision should be further refined to make it more locally distinct through reference to future vision for key settlements/unique Borough assets.
- Review of proposed plan objectives/emerging draft policies against overarching principles may assist in promoting overall coherence of proposals.
- Regional Planning & Policy: Encouraged that SPPS Core Principles adopted as overarching principles to apply to development proposals throughout the Borough.

Summary of Other Responses:

- Note the vision ties in with Community Plan;
- Practicalities will test the policy in the final analysis;
- Economy does not drive health and well-being or a high quality built and natural environment. Sustainability of communities/economy depends on resilient environment. Does not reflect balanced approach set out in SPPS;
- Inconsistent with RDS: does not focus on prioritization of low carbon economy. Appears to adopt negative approach to renewable energy - inconsistent with the RDS & SPPS. Vision should be amended to include reference to low carbon economy;
- Need for enhanced space in Portstewart, preservation of the built environment and adequate funding for both;
- Delivery of vision will dependent on availability of locally produced construction materials;
- Equal weight should be given to social, economic and environmental considerations;
- Alternative vision suggested;
- Direct reference to historic environment should be made as it lies at heart of our sense of place, local identity and character;

- The Council has failed in its duty to support and promote the economic and social viability of small coastal town resort communities. POP shows no intention to change this;
- The vision and objectives should refer to important role of Derry City and Strabane District as a neighbouring council in North West City region, especially to Lisahally Terminal;
- Planning must always be respectful of need;
- Vision does not consider positive role renewables can play in its achievement, e.g. in tackling climate change, protection of sensitive landscapes, or in supporting sustainable economic growth as renewables are a low cost energy option. The POP overlooks opportunity of renewables to contribute to bigger issue of climate change through reduction of fossil fuels use, in line with Government policy and targets;
- Dungiven's Environmental Park must be developed to ensure its full potential to meet local and visitor needs;
- Vision should be refined to be locally distinct through reference to future vision for key settlements or unique Borough assets. Review of plan objectives and emerging draft policies against overarching principles may assist in promoting overall coherence of plan proposals;
- Vision is lacking in character and individuality. Disingenuous to extrapolate policy from a poor community plan process. Need to make the Borough outstanding and excellent rather than just mediocre;
- Adoption of SPPS Five Core Principles is appropriate approach;
- Important that the correct blend of interlinked strategic objectives is pursued;
- The POP presents an overall overtly negative approach to renewable energy provision - at odds with RDS regarding the lack of prioritisation of low carbon economy and climate change. Specific policies to tackle climate change and facilitate development of rural industries, businesses and enterprises in appropriate locations, specifically renewable energy. Landscape and natural resources can still be protected whilst adopting the current policy approach. A proactive approach to the growth of all renewable energy resources should be adopted;
- Silo approach to sustainable development. Needs to be cross-cutting and integrate the sectors/themes. Fails to recognise importance of ecosystems and its part in sustainable development as required by the SPPS, and does not go far enough in meeting the Council's legislative requirement of furthering sustainable development. No regard for protection and enhancement of the natural environment for its own sake – a pillar of sustainable development. The LDP should be set within environmental limits;
- The vision should be revised to be shorter and less complicated.

4.1.2 LDP Strategic Objective 1: Social



Summary of DfI’s Response:

- Objectives grouped around main themes of Community and LDP topic area assists in establishing statutory link between Community Plan and LDP. Welcome acknowledgement of need to take account of wider planning direction established by the SPPS. Classification of objectives useful in highlighting need for balance between all elements of Sustainable Development.
- Council should satisfy itself that number of objectives is manageable, and necessary indicators are available for monitoring/implementation. The Council may wish to consider reducing overall number of objectives, making them more concise, spatially focused and easier to monitor as monitoring will be legislative requirement (once LDP fully adopted).
- TPMU: Social Objective (h) - The Department has provided Council with Accessibility Analyses so council can attempt to ensure that future development is in accessible locations. Suggested that this objective should be amended to reflect the importance of accessibility – and the potential role that Accessibility Analyses can play in reducing the need to travel by private car.
- Water & Drainage Policy Division: Sustainable Water - A Long Term Water Strategy (LTWS) has significant implications for future land use including promoting sustainability and elements of this should be included in the plan's objectives. One key principle of Sustainable Water is to support economic growth towards a modern and sustainable infrastructure.
- Regional Planning & Policy: Social objectives highlight Coleraine and Limavady as the main hubs to be promoted for growth – in terms of housing growth, this is consistent with the RDS and SPPS and welcomed.

Summary of Other Responses

- Growth should continue to be promoted in the main hubs such as Coleraine to remain consistent with the RDS;

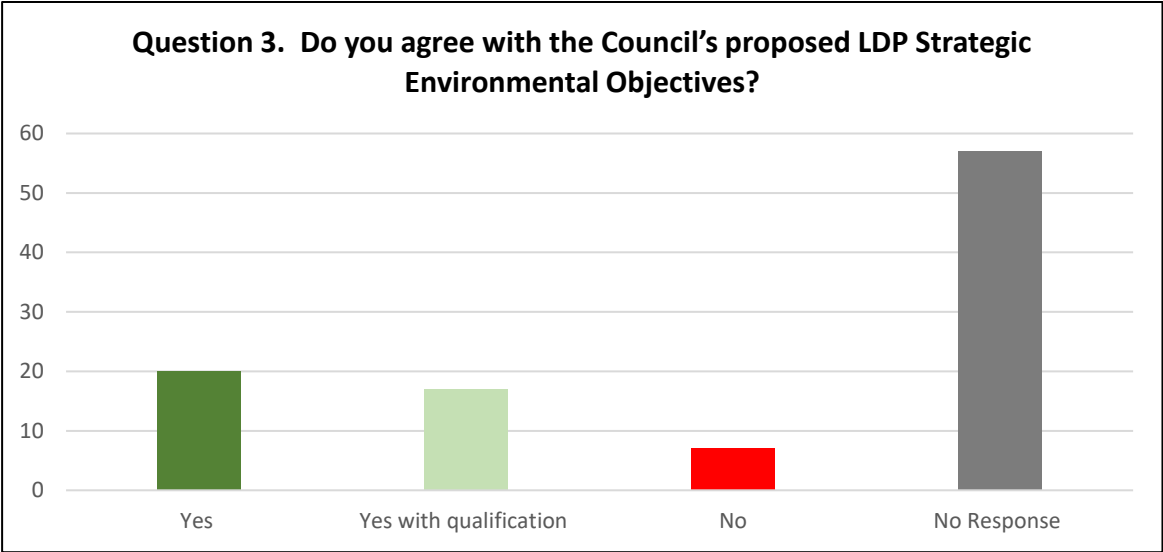
- Need to consider more closely the future of all small villages and communities, not just Rathlin in terms of sustainable growth and the maintenance of vibrant rural communities. Coastal towns should not be disadvantaged, e.g. Portstewart;
- Objectives a. & b. indicate non-hub towns will experience little growth, contrary to the RDS and SPPS re sustainable development. Appropriate growth should be allocated to towns and villages to ensure they remain important local service centres for the existing and future residents and surrounding catchment areas. These service areas are integral to sustaining the rural communities and smaller settlement areas. Towns provide local jobs and easy commute for those living in the countryside – they are significant focal points. The sustainability of growing a settlement must be considered on its own merits in the context of the RDS and if a town, such as Portstewart or Kilrea, is clearly capable of accommodating sustainable development, this should not be dismissed because it is not a hub. Planning cannot ignore demand, there is a clear demand for housing in Portstewart, which has the capacity to satisfy it while meeting key planning objectives;
- Objectives seem to be comprehensive in seeking to deliver under the 3 pillars of sustainable development;
- Add an objective for social development along the River Bann lower corridor as an entity to include hubs and significant sites such as Kilrea and Coleraine;
- Land for housing and amenity development should not result in damage to/destruction of important sensitive habitats/landscape;
- The use of existing/new forests for recreational activities should be considered to contribute to the outcome of a healthy, connected and safe community;
- The overall strategy is based on the fairly modest NISRA population growth projection, HGI and to provide an adequate number of new jobs;
- Reference to supporting moves to a low carbon economy should be added in line with the RDS. POP silent on correlation between its growth strategy and increased energy demand/provision. No consideration how growth strategy could exacerbate climate change rather than help tackle it. Should be cognisant of increased energy demand and how it is resourced. It should plan positively for capturing renewable energy;
- Objective (i) should be amended to refer to enhancement of existing space also. Existing open space needs to be sustainable. Innovative thinking on recreational uses in new development should be encouraged;
- The provision of over 9,000 new homes will require some 600,000 tonnes of locally sourced construction aggregates – where will these come from locally? It is vital that future reserves of aggregates and minerals are safeguarded to ensure a sustainable supply;
- Housing figure needs to be constantly reviewed as circumstances can change significantly and at short notice. Land allocations need to factor in availability of sites and willingness/capacity of owners to develop them;
- HGIs influenced by the fall in rate of house building - is unrepresentative of the Borough as per the POP evidence. Underestimating future Borough population growth will fail to provide housing need to accommodate future growth. Should set HGI aside and consider the interrelation between new homes and wider social, economic and environmental objectives of Borough. To encourage economic growth, closer consideration to be given to evidence base used to formulate housing figures. Future

assessment should take account of most recent data, changing economic context (Brexit) and consider relationship between different aspects such as housing and employment policies. Unclear if housing figure involves double counting of housing need. HGI is an indicator, not fixed. Housing allocation should be increased by 20-25% as land will inevitably not come forward;

- Acknowledgement of how the historic environment feeds into the objectives has been missed. Key heritage issues and likely effects on the historic environment should be assessed through the SA, e.g. role of the historic environment in improving satisfaction of people with their neighbourhoods, engagement of communities, increased access to/enjoyment of historic environment, widen community uses through shared facilities;
- Second homes in coastal communities largely ignored and out of date statistics. While new dwellings are built, the populations are decreasing, e.g. Castlerock and Portballintrae. Portballintrae has more houses than people. Questions how a healthy, safe and connected community be realised in such settlements. A balance between settled and itinerant population needs to be made. Fail to see how the regional strategic objectives for housing in settlements, achievement of sustainable patterns of residential development and strengthening of community cohesion, and balanced communities are targeted in the POP in relation to coastal resort communities;
- Planning must always be respectful of need;
- Growth in the hubs will displace populations that prefer to live in towns that support their hinterland, e.g. Dungiven is losing residents to elsewhere due to a lack of available property in the town. Support for the sustainable provision of necessary community facilities locally will ensure vulnerable people can access these in their local community. Land needs to be zoned in Dungiven for economic development as there is nowhere to expand and businesses have moved elsewhere;
- Essential that the plan promotes high quality design and layout. Development should utilise energy features and sustainable development techniques and practices where possible;
- The council should satisfy itself that the number of objectives are manageable, and necessary indicators are available for monitoring/implementation. May wish to consider reducing the number of objectives, to be more concise, spatially focused and easier to monitor. Objective (h) should be amended to reflect the importance of accessibility and reducing the need to travel by private car. The objectives should include elements of the LTWS, e.g. to support economic growth towards a modern and sustainable infrastructure. Welcome the reference to Coleraine and Limavady as the main hubs to be promoted for housing growth consistent with the RDS and SPPS;
- Ballymoney should be a hub instead of Limavady. A train service is fundamental to sustainable growth which must evolve around sustainable transport. An excess of housing land should be allowed in acceptable locations so developers cannot constrain development and house prices are kept to a minimum. Objectives should include excellent high quality design in the countryside. There should be an insistence on basic qualifications for design proposals as the quality of submissions is often poor and high or excellent quality in design is not sought enough;
- Portstewart, Bushmills and Portballintrae need additional land for housing to consolidate and sustain their roles as local service centres;

- Objective (c) should be reworded to remove its prescriptiveness re housing numbers and refer to a diverse range of specific housing types and tenures;
- The quarrying and minerals industry will play a vital role in enabling the council to achieve a number of objectives. Extraction of minerals is essential to maintain the ability of NI economy to sustain and grow and maintain residents' quality of life;
- There should be greater inter-relationship between the three strategic objectives to avoid environmental trade-offs. Development is not inherently sustainable and only becomes so if it incorporates environmental and social considerations. The condition of ecosystems, provision of services and relationship to human well-being should be integrated through objectives. Social objectives could go further. Public spaces/shared spaces should include reference to sustainable locations/areas of open space. There is a duty on public bodies to further the conservation of biodiversity and enhancement of species or habitat;
- Modern, locally accessible, convenience shopping should be encouraged as shops have a crucially important place and role in community life and securing the objectives;
- Improving economic prosperity in a community through education and employment opportunities can significantly improve long term health and reduce socio-economic deprivation and its outcomes;
- Open space should be viewed as an asset entrusted to all. New development should seek sustainable open space and existing spaces should be retained where it is demonstrated they are utilised on a regular basis;
- Existing housing zonings should be reassessed to establish their likelihood of being released for development. They could become second phase land where it is demonstrated that another portion of land adjoining the limits is readily available for development;
- Small settlements should be included for growth as they form local identities, sense of place, communities and heritage and remain the backbone of rural life, and will enable a sustainable approach to development in the countryside due to the predominantly rural location associated with small settlements. Suitable opportunities for housing in the countryside should exist beyond development limits where appropriate farming and non-farming dwellers support and sustain smaller settlements whilst remaining custodians for the rural landscape.

4.1.3 LDP Strategic Objective 2: Environmental



Summary of Dfl’s Response:

- TPMU: The Department has provided Council with Accessibility Analyses so council can attempt to ensure that future development is in accessible locations. Suggested that this objective should be amended to reflect the importance of accessibility – and the potential role that Accessibility Analyses can play in reducing the need to travel by private car. It appears that the Council focus is primarily on ‘new’/ improved infrastructure – no consideration appears to have been given to the role of the LDP in identifying suitable, accessible locations on the basis of accessibility to the existing transport network.
- Regional Planning & Policy: Providing and promoting more sustainable forms of travel, particularly walking and cycling, are highlighted as strategic objectives – consistent with the SPPS and encouraged.

Summary of Other Responses:

- Objectives must reflect the Council’s statutory duty to further the conservation of biodiversity, in all its functions;
- Opportunity missed to tailor an objective around the protection, conservation and enhancement of the Borough’s unique attributes including its dramatic coastline and exceptional historic environment. Should be an acknowledgement of how the historic environment feeds into the objectives. Tailoring options and/or policy will help ensure that key heritage issues and the likely effects on them are properly assessed;
- Reference to a low carbon economy should be included as per the RDS. The risk posed by climate change to the environment should be addressed in the objectives;
- Should be a new objective that commits the council to creating and protecting resilient landscapes and to ensure the full and best utilization of ecosystem services from that landscape as well as enjoying wider societal benefits. The Plan Strategy should reflect the full economic benefits of having a resilient and sustainable environment;
- The exceptional level of protection provided for European and Ramsar sites and protected species should be extended to include ancient and long-established

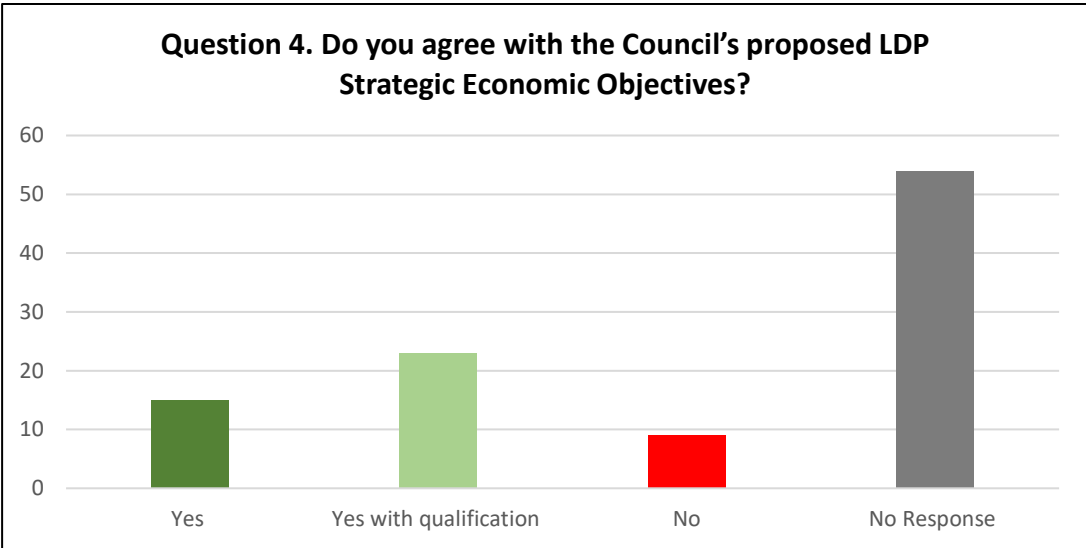
woodland, ancient and veteran trees given their unparalleled and irreplaceable biodiversity level;

- Forests and woodlands are important in highly valued landscapes, and their enhancement is of high importance in forest planting and forest expansion. Woodland creation can mitigate the risk of flooding, and forests provide for recreation use;
- Climate change adaptation/landscape resilience aspect of the natural environment should be protected and enhanced. Strategic tree planting and woodland creation can benefit environmental resilience by providing ecosystem services;
- The word 'sustainable' needs to be carefully described and qualified. The glossary definition negates the importance of the environmental basis of sustainability;
- Vital to protect our built and natural environment but some allowance for the promotion of acceptable, balanced and sustainable development along the river corridor should be included;
- Mountsandel Fort should be listed in its own right due to its importance from a heritage and tourism perspective. Protection of the site balanced with sustainable development should be facilitated;
- Objective b should be amended to provide for inclusive access for disabled residents;
- Objective e needs to be reflected by zoning areas for development that are and will be flood risk free. Objectives g & h need to be reflected in allocations for development which tie closely with existing development footprints;
- Objective d should include 'conserve and enhance' alongside 'protect' our built heritage as per the SPPS, and should be rephrased as Historic Environment. Archaeology is not mentioned. Objective g should include 'respects' and 'enhances';
- Welcome the clear ambition that the built and natural environment is given the protection and recognition it needs;
- The POP is silent on correlation between its growth strategy and increased energy demand/provision. No consideration as to how the growth strategy could exacerbate climate change rather than help tackle it. Should plan positively for capturing renewable energy, to power new development, rather than rely on fossil fuel derived energy;
- The quarrying and minerals industry will play a vital role in enabling the council to achieve a number of objectives. Extraction of minerals is essential to maintain the ability of NI economy to sustain and grow and maintain residents' quality of life;
- There should be greater inter-relationship between the three strategic objectives to avoid environmental trade-offs. Development is not inherently sustainable and only becomes so if it incorporates environmental and social considerations. The condition of ecosystems, provision of services and relationship to human well-being should be integrated through the objectives. Environmental objectives b, c & d require strengthening and extension. Council has a duty to further the conservation of biodiversity and enhancement of species or habitat. Sensitive landscapes must include all protected sites and sites out with the protected sites network. Should be a new objective which steers development to less environmentally sensitive areas including those outside the protected network. Also need a robust policy that protects priority habitats and species, as only a very small proportion of biodiversity is protected in designated sites. Value of old, vacant buildings for biodiversity should be recognised,

and regeneration/refurbishment should include measures to continue to give nature a home. Need to recognise the value of urban biodiversity as it is declining. Objective should be extended to include reference to the incorporation of increased opportunities for biodiversity e.g. swift bricks, bat boxes etc. Objective e, should be extended (or new objective created) to include the measures re climate change mitigation and adaptation as per SPPS, if it is to truly further sustainable development. Should also reference the incorporation of sustainable technology within development design to reduce carbon emissions;

- Modern, locally accessible, convenience shopping should be encouraged as such shops have a crucially important place and role in community life and in securing environmental objectives;
- Provision of green infrastructure and community space is critical in promoting active travel and providing a shared space. High quality sports facilities, defined walking routes and positive use of inland waterways creates opportunities for leisure and tourism and should be evaluated, upgraded and expanded as part of plan process. Emphasis is to enhance the connectivity and infrastructure whilst sustaining and protecting the areas of high scenic value and built heritage;
- Need a joined up approach to transport and infrastructure. Clustering of businesses and services at strategic locations on transport network is critical in encouraging linked trips, car sharing and park and ride facilities, to help reduce car usage and journey times;
- Protection and enhancement of existing open space and provision of new space promotes active and healthy lifestyles and the conservation of biodiversity, which contribute to sustainable development;
- Supports the protection of the Borough's rich and diverse landscape and cultural and folklore heritage and recognises the importance of these for tourism, biodiversity, heritage and conservation values. Retain and protect scenic areas surrounding Coleraine, Garvagh and Kilrea in the interests of biodiversity, open space, recreation, and visual amenity value;
- Rich natural heritage attached to the Sperrin AONB to the south east of Feeny should be protected and promoted where possible;
- Planning must always be respectful of need;
- Environmental Objective (b) could be strengthened through the use of the word 'improve' .i.e. the coastline, river corridors, mountains and other natural and man-made environments in terms of their character, quality and biodiversity.

4.1.4 LDP Strategic Objective 3: Economic



Summary of Dfl’s Response:

- TPMU: Economic objective (a) - Vital that ‘sustainable locations’ definition is provided. Accessibility Analyses must be a key consideration in identifying such locations.
- Economic objectives (e) & (f) - What is meant by 'appropriate location'?

Summary of Other Responses:

- Emphasis on offshore renewables and increased transmission electricity network in the Borough would be welcomed;
- Silent on the correlation between growth strategy and increased energy demand/provision. There is no consideration as to how the growth strategy could exacerbate climate change rather than help tackle it. Should be cognisant of the increased energy demand and how it is resourced. It should plan positively for capturing renewable energy rather than relying on fossil fuel;
- Objective g should be amended to prioritise low carbon forms of transport and electrification of the transport and heat network in the Borough;
- Promotion and sustainable development of blueway and greenway development along the Lower Bann and other river corridors should be included;
- Provision of land for economic development should not result in damage or destruction of important or sensitive habitats or landscapes;
- Forest and wood based product industries have the potential to help sustain sustainable employment. Consideration should be given to the current and potential contribution of existing/new forests/woodland to tourism through improved landscapes/recreation;
- Would welcome some agreed economic development plans linking schools, training and employment;
- Support commitment to manage mineral resources in a sustainable way. Key part of this is the introduction of mineral safeguarding areas and protection of aggregate resources around existing quarries and sand pits to prevent sterilization of reserves by other forms of development. Clear that the minerals industry makes a valuable contribution to the Borough’s economy. Minerals industry supports a wide range of

employment opportunities across a spectrum of skills. Minerals are finite and can only be extracted where they are found. In assessing the sustainability of mineral proposals, consideration should be given to economic, social and environmental effects;

- Mineral resources should be maintained in current sustainable manner with no prospecting;
- Add new objective which seeks to recognise the long-established nature of the minerals industry and encourages the sustainable growth of existing, established employment-generating uses in the Borough to encourage them to grow further through supportive planning policy;
- Objective j is more negatively worded than other objectives. Given the importance of minerals to the local and regional economy, wording should be amended to be positive towards this core industry;
- Welcome insistence of sustainability throughout;
- Opportunity missed by not acknowledging how historic environment feeds into these objectives. Tailoring options and/or policy will help ensure that key heritage issues and the likely effects on them are properly assessed. Objective h should have contained extra wording that recognises the very particular role that the environment plays in the Borough's tourism. Re Objective b, it is important to recognise high volume of visitors that come to the Borough to enjoy its wider natural and historic environmental qualities;
- Foyle Port is the main maritime gateway for the region and plans to have capacity to attract and accommodate major cruise ships that could benefit the Borough and, by enhancing and maintaining infrastructure links, the Council will be well positioned to meet their tourism objective;
- The plan should explain clearly what the council will regard as being sustainable tourism with criteria such as the ability of a proposal to complement the existing offer, improve or address a gap in the existing offer, strengthen the vitality and viability of a town centre;
- The number of jobs to be created in the Borough should be quantified as it could be used as a key performance indicator;
- How have the economic objectives been arrived at if the business community has not been asked?
- Supportive of objectives relating to creation of new jobs and promotion of sustainable regeneration of town centres, and vibrant towns, villages and small settlements;
- Must be remembered that the plan does not directly create jobs, objective a is a by-product of other economic objectives;
- Development will contribute towards new jobs in the construction industry, which is the joint third highest employer;
- No SMART objectives set against the facilitation and creation of adequate number of new jobs at a range of sustainable locations. Plan fails to reflect no land zoned in Dungiven for employment use. There should be an adequate land supply to facilitate sustainable growth on A6;
- Economic prosperity relies on good access links, direct access and avoiding traffic congestion;
- Should be promotion of integrated public transport, cycle and footpath networks;

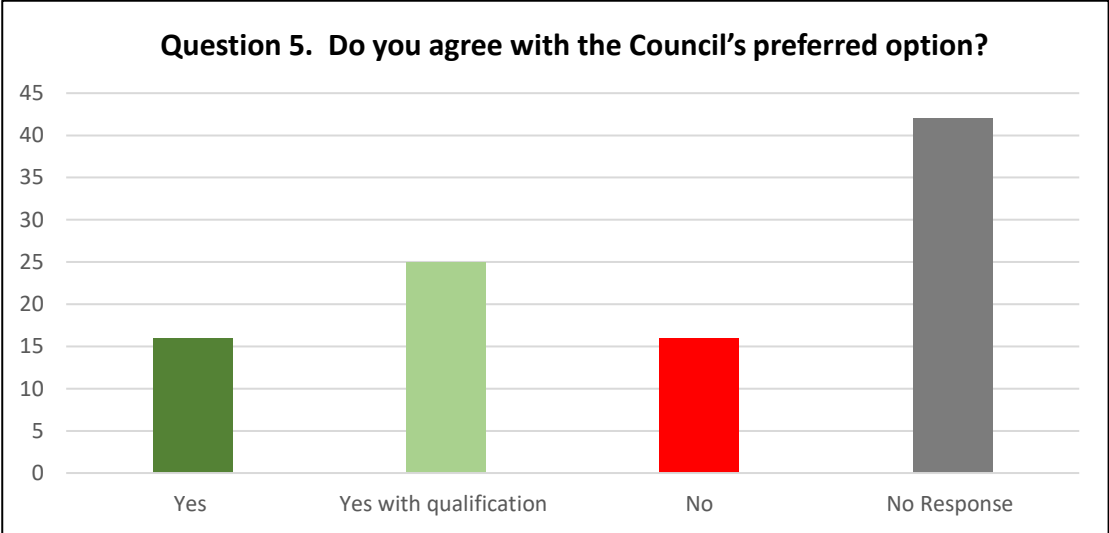
- Sustainable tourism in south of Borough including the Sperrins rather than the coast should be promoted as it causes excess visitors, traffic management issues and pollution;
- Adequate broadband service is essential;
- Objectives require much more detail and vision, e.g. what is an adequate number of jobs? Ballymoney should be a Main Hub; car movements in Coleraine in the evening will enliven it; need to be selective regarding types of retail as out of town centres harm high streets; the word 'sustainable' should be more connected to eco-tourism or environmental tourism;
- To develop economically, need to look at key weaknesses - so priority for additional river crossing in Coleraine to help traffic movements through the Borough;
- An additional objective which refers to the economic importance of fully functioning ecosystems services or natural capital of the environment as per SPPS is required. Development that fails to respect the environment will ultimately erode the ecosystem services upon which the economy and society relies, e.g. re greenhouse gases or flood management. New development should not be considered to be the sole economic driver;
- Re objective (g), the plan needs to articulate that development which results in an increased number of journeys by private car and/or journey length is not consistent with requirement of furthering sustainable development;
- Plan should encourage modern, locally accessible, convenience shopping – it has a crucially important place and role in community life and securing the economic objectives;
- Inward investment should not be prioritised over the investment of existing businesses;
- A range and mixture of town centre uses will attract more footfall, reduce private car journey numbers and reduce shop vacancy. Twilight and night-time economy needs to be considered as catalysts for growth along with daytime economy to maintain vibrancy and reduce vacancy;
- Regeneration and reuse of existing buildings or previously developed land is sustainable and enhances quality of environment, and flexible space for new businesses;
- Existing employment land must be protected against unfettered and unacceptable uses. Need to take account of existing floor space and headroom through consents and complementary nature of proposed alternative uses;
- Plan should support significant leisure and tourism destinations and increase in arts, culture and sports projects, so that mix of activities are available to enhance and encourage visitor growth;
- Enhanced connectivity across transport and technology will assist in economic growth and assist start-ups and home working, which are crucial in rural areas as prevent car travel and contribute to local economy. Policies should support small scale enterprise. In urban areas, knowledge based industry enables local companies to operate in a global marketplace;
- Planning must always be respectful of need.

4.2 SPATIAL OPTIONS & COMMENTS

4.2.1 Spatial Growth Options - Borough

Key Issue: SG1: Spatial Growth Options for the Borough

Preferred Option (Option 3): Focus our housing and economic growth in the hubs and sustain our rural communities



Summary of DfI's Response:

- Welcome preferred option to focus housing and economic growth in Hubs and sustain rural communities, reflective of RDS 2035. Greater clarity on distribution of housing growth under each option would have been welcomed. The absence of detail relating to spatial distribution of growth makes it difficult to comment further.
- Regional Planning & Policy Team: Preferred Option to Focus housing and economic growth in the hubs and sustain rural communities is consistent with RDS and SPPS, welcomed by PPD.
- Acknowledges the RDS Spatial Strategy, identifying Coleraine and Limavady as Main Hubs and Ballycastle and Ballymoney as Local Hubs. Also recognises the potential of these hubs to cluster. The importance of sustaining rural communities is also mentioned. The preferred option is welcomed. There is no specific mention of RDS Guidance "SFG12: Grow the population in the Hubs and cluster of Hubs".
- Water & Drainage Policy Division: Wastewater treatment capacity should be a key consideration when zoning land for development.

Summary of Other Responses:

- Ballymoney should be a main hub along with Coleraine, rather than Limavady, as Ballymoney has a similar population and a train station and is on a main route to Belfast, and has greater weight from a sustainable transport perspective. As a concession, Ballymoney should also be a main hub. Ballymoney has infrastructure, services and public facilities already in place that housing growth can help sustain, making more efficient use of them;

- Development for towns, villages and small settlements is too restrictive. Reasonable development in all settlements should be allowed to reduce pressure on the open countryside. The rural community living in NI's small towns, villages and small settlements has experienced the fastest rate of population growth as per the RDS. Towns play a vital role in supporting the rural communities and smaller settlements. They should not become so restricted that they become deficient in addressing the needs of local communities re jobs, education, social services, recreational and leisure needs and housing as they play pivotal roles, along with smaller settlements, in sustaining rural communities. Sufficient land allocation should be provided in a phased approach, depending on community and business needs. Good transport links and direct access to edge of town locations would prove attractive for business and economic investment. Land that would be open to all types of development should be ranked higher than those identified in the NAP that have sat idle. The proportion of economic development and housing should be linked to population growth. The Borough relies more on tertiary industries than other council areas, vital that appropriate land is made available for development;
- Dungiven should be upgraded to a local hub;
- The preferred option is similar to Mid and East Antrim's with similarly limited development envisaged for the small settlements;
- Appropriate and effective mitigation measures must be put in place, e.g. integrating tree planting in all housing developments can improve water management, create a carbon store and increase landscape resilience which all contribute to climate change reduction and mitigation;
- The preferred option is too simplistic with no distinction between those living in rural settlements and those in single houses in the countryside. Villages provide a necessary support for the wider rural population by way of various services, amenity and employment that are integral and essential for sustainable rural living. The scope of development considered for them should not be constrained to their and the outlying population's detriment and appropriate development should be afforded to these very important settlement nodes. Growth in villages should be supported which, in accordance with the RDS, will enable a redirection of local demand to more sustainable locations in development limits, such as Rasharkin;
- The key focus for development of housing and economic development should remain in the hubs. If the preferred option is to be realised, it needs to be reflected in the plan's allocations. The detailed analysis of all settlements and the countryside and subsequent allocation will establish if the option has been followed through. The POP recognises the hubs potential to cluster, as per the RDS;
- The preferred option is too heavily skewed to the hubs and not sufficiently focused on the RDS key housing objective RG8. So constrained an approach ignores the potential growth of other settlements with an identified capacity to grow sustainably. Portstewart and Kilrea have the capacity to grow but none of the options presented offer an opportunity to assess non-hub towns and facilitate appropriate growth. Growth of the hubs and non-hub towns should be promoted, consistent with the RDS, SPSS and the Sustainable Development Strategy to prepare LDPs with the objective of furthering sustainable development;
- Ignores role of Portrush as having excellent public transport links and being a key tourist hub, and an increasingly popular calling point for cruises and direct point of entry to NI. Existing and unimplemented NAP housing zonings may not come forward

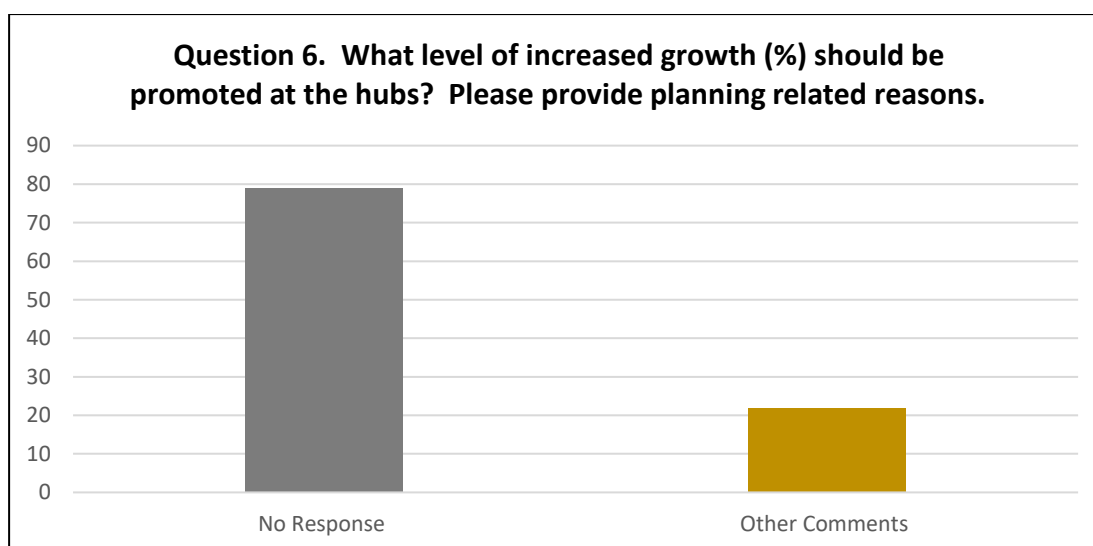
or may be developed for alternative uses. Housing capacity has reduced and the social housing need will also significantly erode the capacity or require new zonings. Second homes market is strengthening. Likely that some greenfield expansion will be required for family homes;

- The preferred option balances hub growth and sustainability in rural communities. It will provide an appropriate balance between the main hubs and important rural communities which make up a significant part of the Borough. The direction of the majority of housing growth to hubs promotes sustainable development by ensuring there is a critical mass to support the efficient use of public services, facilities and infrastructure, and strengthen the role of hubs and their town centres. It allows for growth in towns such as Portrush, Bushmills and Portstewart. Portballintrae village, whilst having lesser services and facilities, has adequate infrastructure. It allows for growth in towns and villages such as Armoy, Cloughmills, and Dunloy. The needs of growing families and allowing people to remain within their own communities needs to be recognised and considered in drawing up new limits, which can be achieved by providing new development opportunities proportionate to the extent of the existing settlement, e.g. Drumagarner. Retaining the existing limits will erode the local rural community rather than sustaining it. Focuses on hubs and small settlements would have very limited development. Small settlements presently have limited or no development opportunity, e.g. Largy. Small settlements should have appropriate allocations of housing land to ensure their growth and sustainability of services etc. is not prejudiced, e.g. Glenkeen. Unclear if the option is limited to settlement types and set apart from development in the open countryside;
- The term 'Rural Communities' is not used in the justification text;
- Option 2 should be chosen. Planning should reflect the existing population distribution otherwise young families will be forced into urban areas, rural communities will age and issues such as rural isolation will worsen;
- A flexible approach must be taken to the HGIs, more generous allocations will assist in securing housing delivery in key locations;
- Water treatment capacity should be a key consideration when zoning land for development;
- Planning Naturally – Spatial Planning with Nature in Mind: in the UK and Beyond, and the Lawton Principles should be adhered to as they capture a broad range of issues that are critical for all effective planning systems. Land is a finite resource and the SEA and robust evidence base should ensure that the amount of development does not exceed environmental limits. A robust land strategy for NI would assist. Consideration should be given to environmental capacity through studies, as per the RDS. Needs to be a commitment to steer development away from sensitive areas, and a robust policy to protect priority habitats and species as per the Biodiversity Strategy. The spatial growth strategy must have cognisance to the importance of ecosystem services;
- There should be a preferred approach for housing in the countryside as this is a key issue. The dispersal of development in the countryside is wholly inconsistent with strategic policy;
- Larger settlements, due to their critical mass, should have a higher order and range of employment, services and infrastructure and are best placed to accommodate growth. However, there is also a strong rural community which needs to be supported by vibrant villages and small settlements and appropriate flexibility is

required to accommodate demands and support dispersed rural communities. Sufficient land must be provided at a variety of locations across the Borough and this must be considered in conjunction with the existing hierarchies. Housing growth will act as a catalyst for employment growth in retail, industrial and service sectors. Any increase should take account of the overall population growth for the Borough and then be weighed towards the hubs;

- Each small settlement should be considered on its own merits depending on its characteristics and services as many provide local facilities and services for the surrounding population. Their geographical location normally allows relatively easy commuter times for people who do not wish to live in more compact urban areas. Many small settlements provide necessary support for the wider rural population by way of schools, nursery and play groups, sports grounds and other services that are integral and essential for sustainable rural living. Appropriate development should be afforded to these very important settlement nodes;
- Planning must always be respectful of need.

4.2.2 Spatial Growth Options – Percentage to Hubs



Summary of DfI's Response:

- No response

Summary of Other Responses:

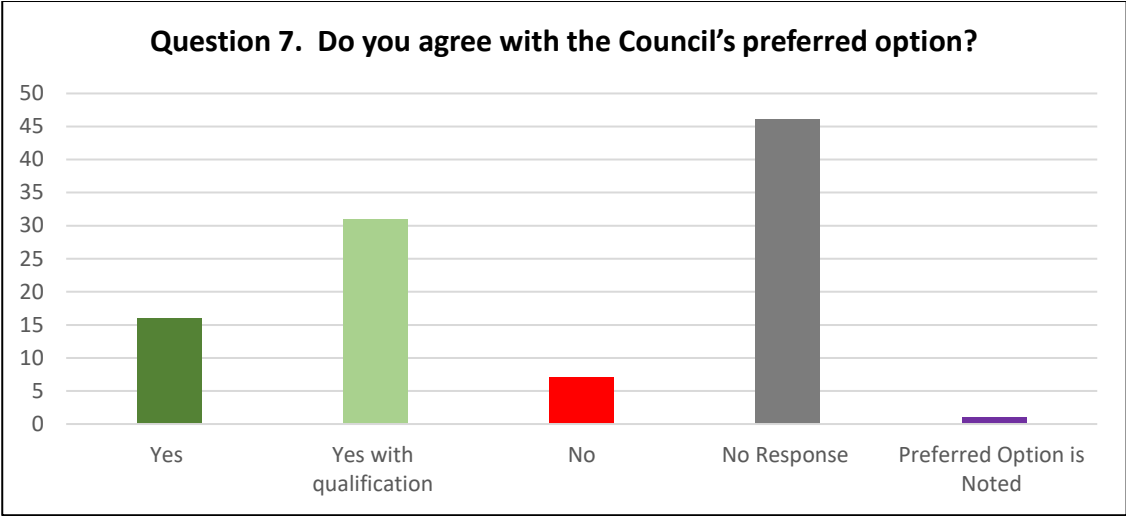
- Unsure how to respond as do not know what is realistic and achievable, would be better to have examples or options of percentages along with their related planning reasons to select an appropriate one;
- 37.2% should be directed to the four hubs and the remainder to the rural areas and small settlements, which is reflective of the proportion of the population that currently live in the hubs;
- Hubs should be reviewed on an individual basis;
- 50% should be promoted at the hubs;

- Sheltered housing development should be a priority for older people, enabling them to downsize into a secure and sustainable community. This would free up larger properties for younger families and reduce the burden on the social and home care sectors. Such developments must have good transport links to local shops and be located close to hubs of retail outlets;
- Growth has to consider the downturn in the global economy. The figures provided are not realistic;
- Should be a further option that distinguishes between rural areas and rural villages as it is necessary to make a clear allowance for the promotion of sustainable villages outside of the hubs. This is likely to be the best deterrent to further housing in the countryside given their distribution, with each servicing key local roles. Current villages, including Rasharkin, are ideally placed to facilitate small scale extensions;
- As 55% of the population live in hubs and towns, at least that percentage should be provided there. Holiday home/tourist accommodation may well skew those figures upwards. Ballycastle has specific potential to help drive North Coast growth and this should be reflected in zonings;
- Housing land should be apportioned as per table 12 in the POP. When apportioning the 51% to the hubs, this should be weighed in accordance with the respective population of each settlement;
- The majority of growth should be concentrated in the hubs as growth should be focused on areas where there is current service provision to ensure sustainable growth, e.g. along existing rail and bus network to enable settlements to grow;
- Towns which serve local hinterlands should be targeted for growth, rather than relocating everyone to hubs which have socio-economic problems;
- Allocations should be broadly in line with population distribution in the main hubs;
- Focus should be on excess, rather than constraint so that development is encouraged and house site prices are kept lower. Percentage figure is a matter for consideration and debate at the Plan Strategy stage. Most of the increased growth should be directed to the hubs, as per the RDS. Ballymoney, Portrush and Bushmills should be promoted for further growth as per the RDS. Portstewart is an example of a smaller urban settlement in the surrounding rural area that can perform some of the functions of the larger towns as per the RDS and it will need to accommodate future housing growth;
- Any percentage could be considered premature, as it is dependent on various capacity studies. It is unsustainable to choose an arbitrary percentage without sound data. Consistent with the RDS, hubs should be the focus of housing and economic growth, and the consideration of the data will provide refinement and contribute to development within environmental limits. This is up to the council to determine in line with the RDS.

4.2.3 Settlement Hierarchy

Key Issue: SG 2: The Settlement Hierarchy

Preferred Option (Option 2): Review the existing Settlement Hierarchy.



Summary of Dfl's Response:

- Helpful if settlement hierarchy had been reviewed to inform possible options under this section. The preparation of settlement appraisal reports will be important in refining the evidence base in support of any revised settlement hierarchy. Welcome questions posed within section and hope they will prove useful in garnering views on this important matter. Further discussion is required on the proposed approach in this area.
- Welcome the evidence presented in relation to the distribution of the Borough's population by settlement type, remaining housing capacity, housing completions and urban and rural build rates. Council is reminded that the HGI is an estimate of the new dwelling requirement. It should be used for guidance rather than a cap or target to be achieved re housing growth. Council reminded that new 'soundness' based approach will examine plan soundness 'in the round' by reference to evidence presented in support of plan policies and allocations. The absence of objections on a particular issue may not therefore prevent the Commission from considering any aspect that goes to the soundness of the plan overall.
- It is noted that there is a potential for an additional 16,000 units based on lands zoned for development in settlements and the amount of housing potentially deliverable in the countryside under current rural housing policy. This figure, approximately 70% higher than the HGI (pro rata to 2030) is acknowledged in the POP as 'significantly' higher than the HGI. What consideration has been given to the issue of aligning housing need more closely with the available housing land allocation in the plan? Welcome that review of existing uncommitted housing zonings in the NAP will be undertaken to determine if sites remain available and deliverable. Review results may help inform the Councils proposed approach moving forward. Council is reminded of SPPS requirement to make an allowance for windfall housing that may come forward on un-zoned land within settlements over the plan period. This could be informed by an analysis of the

proportion of units that have historically come forward from this source, or the outputs of urban capacity analysis of main settlements.

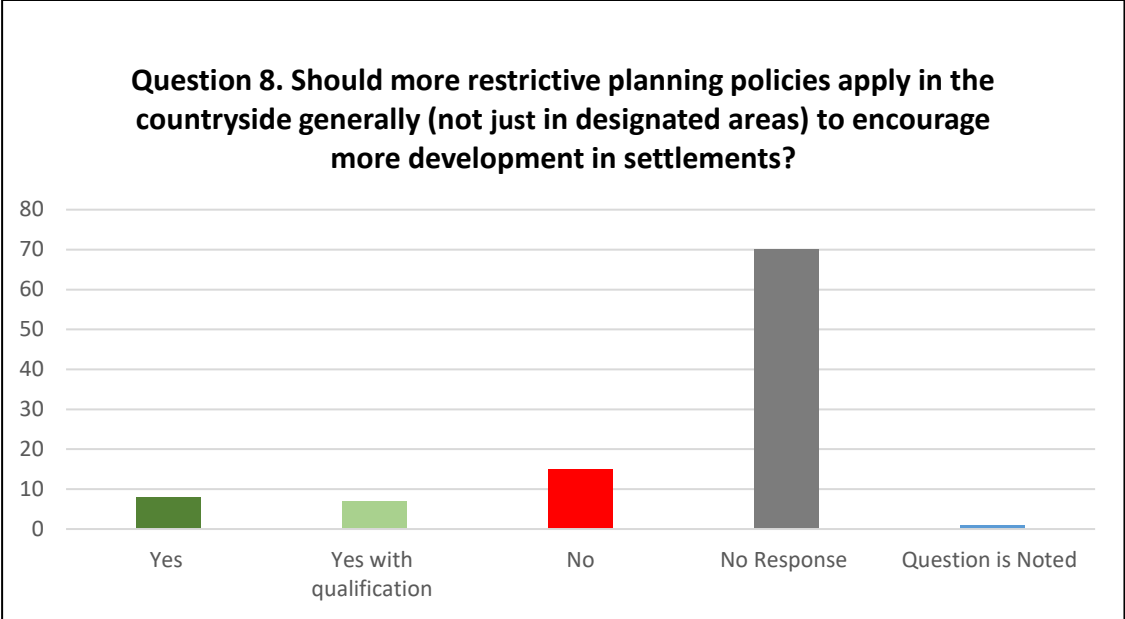
- Encourage further liaison with NI Water and other service providers on the settlement evaluation required as part of the existing hierarchy review and in developing the Spatial Growth Strategy.
- Water & Drainage Policy Division: Adequate water, sewerage and drainage infrastructure must be in place to facilitate new industrial and residential developments, promote tourism and attract inward investment to grow the area.
- The settlement hierarchy should take into account the principles of Sustainable Water – A Long Term Water Strategy. Wastewater treatment capacity should be a key consideration when zoning land for development and considering settlement hierarchy.
- Regional Planning & Policy Team: All hubs, towns, villages and small settlements are identified in accordance with the RDS. The Council's preferred option under SG2 is consistent with policy and welcomed PPD.

Summary of Other Responses:

- The warning contained in the RDS re the disproportionate growth of smaller settlements and the resultant potential prejudice to the role of larger settlements should be observed. Essential for a sustainable approach to further development - important to ensure that growth does not exceed the capacity of the environment or the essential infrastructure expected for modern living as per the RDS;
- Housing provision is too restrictive;
- Reasonable to review the hierarchy taking account of up to date information. Mid & East Antrim has taken a similar approach. Settlements close to the boundary include Rasharkin, near to the village of Portglenone, Cloughmills, close to the village of Clough, the small settlement of Corkey, close to the village of Cargan, the small settlement of Glenariff Bay and the village of Waterfoot, close to Garron Point which is proposed to be de-designated;
- Ballycastle, as a local hub, has not received a suitable allocation in the past and concerned if development continues to be directed towards Portrush and Portstewart to further their growth that soundness of hierarchy would be at risk. Distribution of new housing should reflect better the RDS's focus for growth of the hubs;
- There should be the inclusion of access to blueway and greenway space and the Lower Bann corridor;
- Given the higher prevalence of environmentally important or sensitive areas in the countryside, adequate protection must be given to these areas to ensure the Borough can benefit from the landscape resilience and the full suite of ecosystem services, and cumulative effects must be fully considered and costed, given the often undervalued economic benefits of ecosystems. Small developments such as housing are clearly not spatially dependent nor of regional significance, and there is no reason why they should be located where they will cause damage or loss to ancient or long-established woodland. Ancient and long-established woodlands are irreplaceable but are undesignated as a habitat classification - this does not mean they do not warrant protection from development. Compensation/mitigation planting are not appropriate or acceptable in the case of such woodland;
- Macfin should be designated as a small settlement;

- Development should be directed to settlements and urban sprawl avoided. More restrictive policies should be applied to sensitive parts of the countryside, e.g. AONBs, Areas of High Scenic Value, Special Countryside Areas and the World Heritage Site;
- Query how the council can propose to include buffers to settlement boundaries in the absence of an updated review;
- Local social, community, cultural, heritage and historical considerations mean there should be a more relaxed policy in terms of housing in the countryside particularly for local people;
- Review allows for reclassification of settlements. Findings from the Sustainability Appraisal will take account of the physical infrastructure and available services and facilities to support new developments;
- HED Gazetteer of Nucleated Historic Urban Settlements should be of use in the review and understanding the development and evolution of settlements and planning for future growth, designation, regeneration, or key site requirements in relation to zonings;
- Hierarchy should be examined to determine if it is still appropriate in the context of available up to date information including physical infrastructure and available services and facilities. Bendooragh has a rising population in excess of others;
- Option 1 should be chosen, in the context of Ballybogy, there is no compelling need to revisit it. If option 2 is followed, Limavady should remain as one of the two main hubs in the context of the RDS. Limavady has a significant service base, good road connections, in proximity to the City of Derry Airport and Port of Londonderry. It also had a large urban population and serves a large rural hinterland;
- Preferred option may conflict with SG1 which states small settlements would accommodate very limited development;
- Lack of development opportunities in small settlements is currently limited. Largy has limited to no opportunity;
- Limavady and Castlerock are sustainable locations for housing growth, with Limavady appropriate for strategic growth. Limavady has the potential to cluster with the other hubs as per the RDS;
- Bushmills has extensive facilities for a community of its size, and its status in the hierarchy should be safeguarded, and appropriate zonings and policies brought forward to permit sustainable expansion of the town and tourism infrastructure. Bushmills and Portstewart should remain as towns and Portballintrae and Balnamore as villages;
- Reassessment should be carried out on an ongoing basis;
- It may be appropriate to consider the movement of several of the larger tier 3 villages which can accommodate growth to tier 2 towns, and tier 2 towns to tier 1 hubs, which will ensure the 60% RDS target re brownfield sites is met;
- Feeny should be either a town or small town;
- Planning must always be respectful of need.

4.2.4 Settlement Hierarchy – Increased Development within Settlements



Summary of DfI’s Response:

- No response

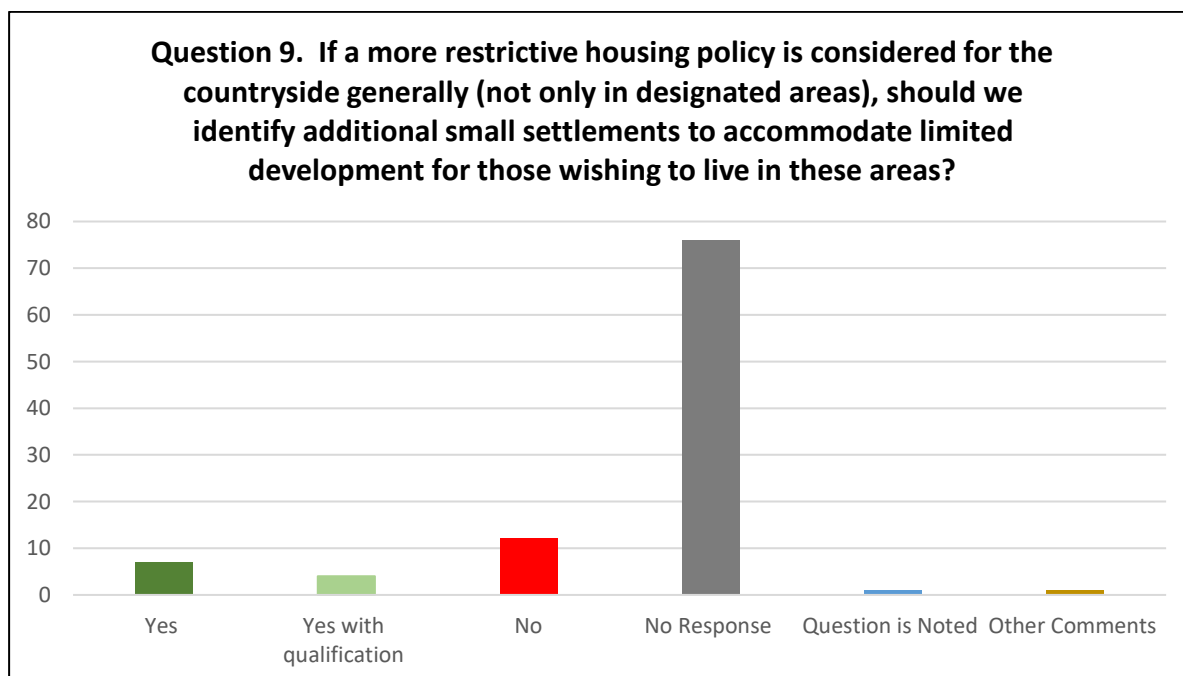
Summary of Other Responses:

- A balance should be sought between urban/rural development which is reflective of the current population trends for urban and rural areas. Approximately 30% of the population lives in the countryside and a more restrictive rural housing policy would not accommodate this significant proportion of the population;
- A balance must be struck that allow for exceptional situations;
- Adequate protection must be given to environmentally important or sensitive areas in the countryside to ensure the whole borough can benefit from the landscape resilience and the full suite of ecosystem services. Cumulative effects of landscape resilience and proposed development within the countryside must be fully considered and costed, given the often undervalued economic benefits of ecosystems. Small developments are not spatially dependent nor of regional significance and there is no reason why they should be located where they will cause damage or loss to ancient or long-established woodland. Ancient and long-established woodlands are irreplaceable but are undesignated as a habitat classification - this does not mean they do not warrant protection from development. Compensation/mitigation planting are not appropriate or acceptable in the case of such woodland;
- Restrictive policies should not be applied to renewable energy projects as this would represent a significant departure from the RDS and the SPPS;
- Increasing housing and development that is more suited to urban or existing settlements endangers the sustainability of rural industries such as minerals, agriculture and renewable energy that are best placed away from housing;
- Local social, community, cultural, heritage and historical considerations mean there should be a more relaxed policy in terms of housing in the countryside particularly for local people;

- More development should be encouraged in settlements. Continued development , particularly of single houses, in the countryside cannot be considered as sustainable for a number of reasons: inefficient provision of services, need for private transport for journeys, need for sewage treatment usually through septic tanks which have a serious deleterious (though unquantified) effect on water quality, growing problem of social care for the elderly and infirm, loss of wildlife habitat and landscape value counter to many planning policies and the biodiversity duty;
- Consideration should be given to retain majority of rural planning policies, as have concerns over the quantity of housing which could be assigned to the countryside with risk of potential adverse impacts on the historic environment. Strong rural planning policies are important in aligning with SPPS, as they can protect, conserve and enhance historic landscape character and encourage the reuse of historic structures which bring distinctive identity to the area. Historic Environment Division (Dept. for Communities) Gazetteer of Nucleated Historic Urban Settlements should be used in understanding the development evolution of rural settlements to aid designation and characterisation etc. It may be of benefit to monitor rural housing development, especially the number and type of replacement dwelling approvals in the council area, to quantify the percentage of the loss of non-designated heritage assets. Concerned about the impact replacement dwellings is having to ongoing loss of historic rural vernacular structures. Has the Council reviewed the percentage of replacement approvals in the council area? SPPS steers toward reuse of buildings in countryside. Loss of non-designated heritage assets can negatively impact the local identity and distinctive historic character of an area. There is an opportunity at the Plan Strategy to consider specific policies to ‘protect’ these assets from inappropriate or unnecessary replacement or to consider local listing. The Council may wish to monitor rural housing development, especially the number and type of replacement dwelling approvals in the council area, i.e. to quantify the percentage of the loss of non-designated heritage assets;
- Rural build rate is clearly at an unsustainably high level. Perverse that the rural annual build rate equals or exceeds the number in all settlements. Reducing the rural build rate will have many beneficial effects from a visual and landscape perspective, and by reducing pressure on services and will result in more demand for housing in settlements, which is the strategic direction sought in SG1 of the POP;
- There needs to be some control over building in the countryside to prevent it from becoming a measles landscape. Preferable that countryside development is in small groups where transport links and adequate infrastructure exist;
- Rural communities will significantly lose out. Rural natives will be forced to migrate elsewhere and out of the council area since housing is unavailable in rural settlements because of inadequate infrastructure and harsh restrictive rural housing policies;
- Settlements should be considered in areas where there is sufficient services to accommodate the development otherwise developer contributions should be sought to provide the necessary services;
- Planning should always be respectful of need;
- Implications post-Brexit for farming communities will have to be taken into consideration when determining future countryside planning policies;
- Rural policies set out in the SPPS and PPS 21 should remain in broad terms. More restrictive policies would not be appropriate;

- Any future development in the countryside must not prejudice the delivery of sustainable patterns of growth or urban regeneration, while protecting and enhancing the natural environment. An evidential sequential approach to development must be used to produce settlement patterns which further sustainable development, and are set within environmental limits. Any proposal which reinforces dispersed patterns of development should be resisted. Where new development is demonstrated to be necessary, the reuse of existing buildings should also be promoted;
- The approach must be to strike a balance between providing appropriate development opportunities and despoiling the countryside with development that is inappropriate in scale or location. Account will need to be taken of the existing rural communities' needs and the ability of the landscape to absorb new development. The re-use of existing buildings is clearly sustainable and minimises the impact on the landscape, and should be actively encouraged where suitable;
- Planning polices for the countryside should allow and encourage appropriate development in the countryside. It is necessary for many people to be able to live in rural locations to support family farms, to carry-on environmental stewardship and to run rural businesses. Living within a settlement is not an option or appropriate for everyone. Small businesses, start-ups and farm diversification projects in the countryside reduce the need to travel into town for employment, create employment outside of the hubs and settlements, and make rural living increasingly sustainable. This helps to revitalise the countryside and reduce dependence on agriculture, the future of which is uncertain (especially with Brexit).

4.2.5 Settlement Hierarchy – Identification of Additional Small Settlements



Summary of DfI's Response:

- Reservations that Council is seeking views on the identification of additional small settlements in advance of any detailed review of the existing settlement hierarchy being

carried out. Reiterate that whilst the RDS refers to importance of vibrant rural communities, strategic level emphasis is on focusing development on the larger settlements, and in particular, the Hubs and Clusters of Hubs - not the designation of new settlements. It is unclear how rural policy might operate to ensure that growth is redirected from the countryside to newly identified settlements rather than from higher tier settlements within the hierarchy, thereby undermining RDS objectives.

Summary of Other Responses:

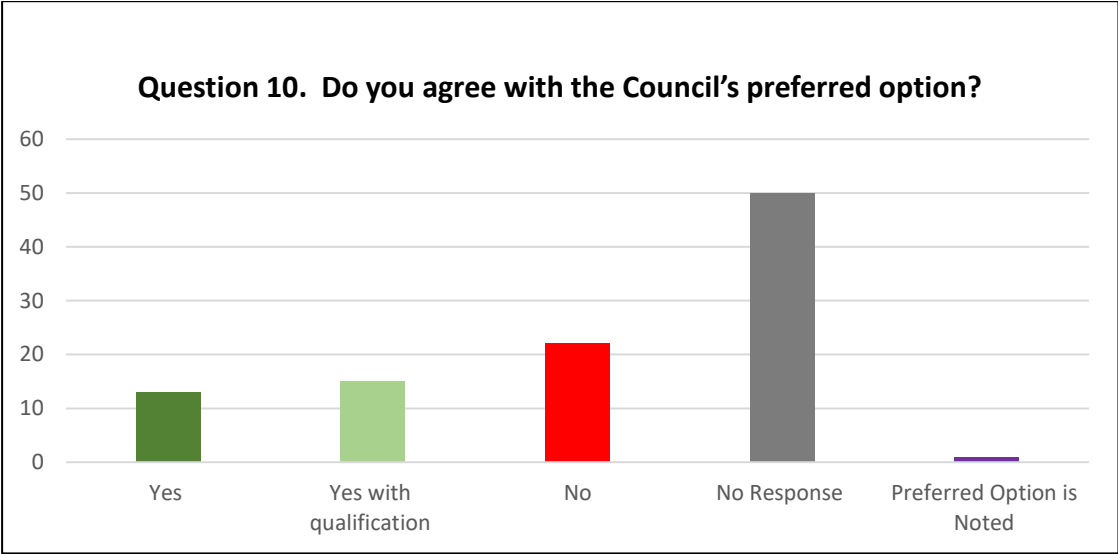
- An abundance of small settlements already exist in Northern Ireland;
- Two major housing developments in Dungiven Lower Main Street - nothing being done to build homes;
- This would not address the needs of rural housing for rural communities;
- Closer attention has to be paid to ensuring longer term sustainable infrastructure;
- Existing rural policy is sufficient;
- This would be for the council to determine;
- Given the higher prevalence of environmentally important or sensitive areas in the countryside, adequate protection must be given to these areas to ensure the whole borough can benefit from the landscape resilience and the full suite of ecosystem services. The cumulative effects of landscape resilience and proposed development within the countryside must be fully considered and costed, given the often undervalued economic benefits of ecosystems. Small developments such as housing are clearly not spatially dependent nor of regional significance. There is no reason why they should be located where they will cause damage or loss to ancient or long-established woodland. Ancient and long-established woodlands are irreplaceable but are undesignated as a habitat classification - this does not mean they do not warrant protection from development. Compensation/mitigation planting are not appropriate or acceptable in the case of such woodland;
- The council should identify additional small settlements but not based on a more restrictive housing policy;
- This would be a logical step to provide the housing required in a semi-rural setting. It would provide some efficiencies in terms of infrastructure and service provision, it might justify some rural public transport, and more efficient sewage treatment provision could be provided;
- Expansion of existing settlements such as villages would counter demand for new housing in the countryside;
- Suggest that to aid the understanding of the development of the settlements, including recognising (historic) deserted settlements or shrunken settlements, it is important that the historic environment evidence base is properly assessed in this process. This will enable characterisation and potential identification to enable the development of appropriate policies such as mitigation or designation of LLPAs etc. Have particular concerns over the potential for adverse impacts on historic landscape character, and believe there should be a policy focus on the appropriate and sympathetic reuse of existing historic structures. See our answers, notably to Q8, Q9 and Q37, for common related themes around reuse of existing heritage assets;

- Development should only be located within areas that are sustainable. Meaningful key site requirements should be applied;
- Planning must always be respectful of need;
- No need to identify more small settlements if current PPS21 cluster policies are retained;
- It is the way the countryside used to be. There should be more focus on clachans and clusters, but there needs to be an insistence on design quality;
- A more restrictive housing policy should apply in the countryside generally, but this should not then be directed to additional small settlements. The existing small settlements can provide for some of this housing growth, but it is much more sustainable to have housing growth targeted at the hubs, towns and villages;
- No additional small settlements should be identified. The existing small settlements can provide for some of this housing growth, but it is much more sustainable to have housing growth targeted at the hubs, towns, particularly Portstewart, and villages;
- To ensure that there is a furthering of sustainable development within the LDP, a clear definition supported by parameters and criteria will be necessary for the robust assessment of any new small settlement designations arising from a cluster of development. Failure to do so could result in the potential for dispersed patterns of development, and increased pressure on the rural area (in terms of capacity and biodiversity) – all of which are contrary to the principles of sustainable development, and strategic policy. The approach needs to be in line with SFG 12 of the RDS with regards to the disproportionate growth of smaller settlements and resultant potential prejudice to the role of larger settlements. Within the rural area, there should be a general presumption against dispersed rural housing which increases pressures on areas which are more likely to be of value for nature conservation. Where development is necessary, the reuse of existing buildings should also be promoted to avoid the need for new development. Refer to RSPB's response to DoE's Strategic Planning Policy for Development in the Countryside;
- There are many hamlets, clusters and groups of houses with other non-residential buildings that could form the nucleus for new development. Re-use or replacement of existing redundant buildings for residential use should be provided for.

4.2.6 Sustainable Growth – Location of Zoned Development Land

Key Issue: SG3: Location of Zoned Development Land

Preferred Option (Option 1): Only zone land for development where adequate infrastructure exists or is planned.



Summary of Dfl's Response:

- Strongly welcome approach at paragraphs 6.14 and 6.15 as it acknowledges the emphasis within the RDS and SPPS on the importance of the relationship between housing, jobs, facilities and services and infrastructure. However, Option as presented appears not to acknowledge the possibility that infrastructure might be secured by way of developer contributions set out in Key Site Requirements within the Plan. Further clarification of the Council's intention is required.
- Dfl Roads - This section identifies 3 key considerations in relation to the existing physical infrastructure to accommodate further development i.e. water provision, energy supply and transportation infrastructure. Comment is provided for water provision and energy supply but not for transportation infrastructure. The strategic integration of transport and land use should be a consideration in the development of options in terms of sustainable growth. For example, Preferred Option 1 – how will the existing transportation infrastructure be considered when zoning land for development?
- TMPU: Paragraph 6.15 is welcomed. Option 1 - cautious to support the preferred option – however, the key issue lies with the definition of 'adequate'. How will the adequacy of the transport network be considered?
- Water & Drainage Policy Division: Reference made to the ability of existing physical infrastructure to accommodate further development and Table 7 highlights capacity at water treatment works. The title of this table is incorrect and should refer to wastewater treatment capacity.
- Council has demonstrated a good working relationship with NI Water. Welcome this and that information regarding capacity at wastewater treatment has been shared with the Council. This information has helpfully highlighted wastewater treatment works that are reaching capacity or have insufficient capacity.

- Regional Planning & Policy Team: The Spatial Growth Strategy allows for existing housing commitments as per SPPS requirements. Council approach regarding levels and distribution of existing commitments, is consistent with para 6.139 of the SPPS.
- Preferred option SG3 – Council has identified only one option which consistent with the RDS and SPPS. The preferred option to only zone land for development where adequate infrastructure exists or is planned accords with RDS Guidance “RG8: Manage Housing Growth to Achieve Sustainable Patterns of Residential Development”, although this is not referenced in the POP.

Summary of Other Responses:

- Future energy infrastructure requirement not currently known, so zoning land only at existing infrastructure would limit possible solutions in the future. Better to create a number of suitable zones, even in areas where there is currently no infrastructure;
- Suggest more flexible wording than ‘planned’ such as ‘has the potential to exist. e.g. through key site requirements, developer contributions etc.’;
- The justification given is reasonable;
- Recommend a review of the current zoned land, not only to identify that which does/will benefit from existing or planned infrastructure but to identify those currently zoned lands which fall outside of these parameters and consider the possibility of offering them for alternative uses, e.g. the provision of open/green space;
- In terms of the evidence base for housing allocations is accurate, the findings of the urban capacity study showing the supply and distribution of sites will be thoroughly assessed. Two matters require further consideration - the higher number of house completions under the former rural remainder policy that predates PPS21, with many of those units approved commenced but not finished. A significant proportion of current approvals are substitution permissions for historic consents and should be discounted from the build rate since 2010 to understand the number of new housing units coming forward under the PPS21 context. Regarding the current housing potential for sites inside development limits, the housing monitor uses a flat density multiplier rather than current best practice in housing and economic land availability assessments including the need for scored assessments based on suitability, availability and achievability. An assessment based on these could result in a different set of figures and it is premature to reach a conclusion until the stage that there is sufficient housing land available to meet the HGI;
- Support the proposal to only zone land for development where adequate infrastructure exists or is planned. Infrastructure has not kept pace with rapid increases in tourist numbers. Further development (especially to cater for tourists) should be contained to areas where the infrastructure can cope or where existing infrastructure is being sensitively improved to better cope with demand which in turn would help towards a zero carbon footprint;
- The needs of community must be considered in growth areas that may require re-zoning;
- Review on a case by case basis - it may not cost a lot to upgrade some infrastructure;

- Disagree with the councils preferred option as infrastructure improvements can be planned over a short term (5 years), such as upgrades to or provision of waste water treatment works to enable housing growth. The local development plan will have a lifespan of 15 years and therefore needs to be adaptable. Notwithstanding, the infrastructure could be delivered alongside the development, such as relief roads etc. Only zoning lands where adequate infrastructure exists or is known to be planned would unduly prejudice lands that could be made suitable with the introduction of suitable infrastructure. We therefore would urge the council to reconsider this approach;
- On site infrastructure such as WWTPs can be provided in settlements where there are infrastructure deficiencies such as sewerage e.g. Greysteel;
- Fully support that only lands which have sufficient infrastructure available either now or in the future (to be delivered through a planned upgrade) should be zoned. This chimes with the LDP tests of soundness in that sites identified for development need to have a realistic expectation of being delivered. To inform this assessment, suggest the council should undertake a detailed critique of all currently zoned, but undeveloped sites to understand the reasons why the lands have not come forward for development;
- Acknowledge the option of only zoning development land where adequate infrastructure exists. However, advise caution and ask council to utilise the historic environment evidence bases, datasets etc., to assess impact of zonings and for informing potential mitigation such as designation or key site requirements, i.e. to ensure any zoning takes due regard of the historic environment and the heritage assets within. Evidence from previous developments indicates that archaeological remains are often adversely impacted through large zonings of previously undeveloped land. An increase of 20% in the zoning has potential for negative impacts on historic landscape character and the historic environment which will require appropriate consideration in the context of mitigation measures;
- Site specific mitigation (road improvements/on-site waste water treatment plants) should not be dismissed at this early stage particularly where a developer led opportunity exists;
- While we agree with the Council's recommendation that land should be zoned in settlements where adequate infrastructure exists i.e., where there is WWTW capacity or there are plans in place to upgrade the WWTW within the lifetime of the LDP consideration, site specific mitigation (road improvements/on-site waste water treatment plants) should not be dismissed at this early stage particularly where an developer led opportunity exists;
- We agree with the Council's recommendation that adequate infrastructure is required to facilitate sustainable new development on zoned sites, and to ensure that the land is both available and deliverable so that it can reasonably be expected to come forward within the timeframe of the Plan. In relation to Limavady, it is acknowledged that the town has more than adequate infrastructure to facilitate sustainable development as described above. Furthermore, the Council should undertake an assessment of existing undeveloped zoned / unzoned land within the settlement limit as shown in the Northern Area Plan 2016. If there are lands that have remained undeveloped and without planning permission for a significant period of time, then the Council should give serious consideration to dezoning those lands and instead bring lands within the

settlement limit where they will consolidate the existing built form and there is a reasonable expectation they will come forward within the new Plan period;

- Such an approach flies in the face of the concept 'sustainable growth'. Landowners with land on the outskirts of existing settlements will be prejudiced and miss out on the opportunity of having their land zoned due to insufficient infrastructure. It is the responsibility of CC&G Council and our government to ensure that all existing towns, villages and settlements in N.I. are well equipped with adequate water, energy and transportation supplies. Why designate settlements and promote 'urban living' if the infrastructure in our towns and villages are not designed or equipped to cope with growth. Only one option was proffered by the Council. The POP states on page 40 that this is their preferred option. We are extremely disappointed at the lack of thought, preparation and imagination which went into delivering this one and only option for sustainable growth and the location of zoned development land. It would appear as if little work has been conducted or research carried out into land availability for housing within our towns and villages. Artikelly urgently requires additional land allocation to provide much needed housing for the employees of the adjacent employment centre. Should the Council decide that current infrastructure Artikelly is insufficient, future housing growth will be hampered and the current settlement limit kept like present for the entire plan period. Such a decision is disastrous for our clients as their land will never be considered for inclusion within the limits or indeed new housing. The Council's one and only preferred option to restrict housing growth and new zonings to towns, villages and settlements with adequate infrastructure is flawed and prejudiced. A realistic assessment of dwelling yield involving a review of all sites within the plan area and currently zoned land is required during this plan making process. If housing is in demand and land owners are prepared to offer their land for inclusion within a village or settlement, then CC&G Council and our government need to put plans in place to ensure adequate infrastructure is made available over the plan period. Housing growth cannot not be delayed because of inadequate infrastructure particularly in small rural settlements such as Artikelly. If more restrictive housing policies are introduced and the delivery of housing hampered because of inadequate infrastructure, then where will our rural community reside. Such an approach is unsustainable and contrary to the aims and objectives of the RDS and SPPS;
- Would agree that to accommodate future development existing physical infrastructure must exist. The lands shown on the attached map identified for inclusion within the settlement limit of Largy have adequate infrastructure with a local Water treatment plant situated to the north east of the lands adequate to accommodate increased development within the settlement. The lands also adjoin an existing open space and local playing field. The existence of this infrastructure and open space make the lands appropriate for development. The development, such as relief roads etc. Only zoning lands where adequate infrastructure exists or is known to be planned would unduly prejudice lands that could be made suitable with the introduction of suitable infrastructure. We therefore would urge the council to reconsider this approach;
- Council need to re-employ staff to carry out council duties and remove expensive outside contractors in order to respect the rates people pay;

- Provision has not been made for additional energy demand. In order to facilitate sustainable growth this should be considered through the LDP;
- One option put forward where argued that only zoned land can reasonably be expected to come forward within timeframe of plan. No zoned land in Dungiven but demand for workspace. Need for land zoned to enable expansion for existing tenants in Enterprise Centre and Business Park, as well as providing for new entrepreneurs;
- Welcome the commitment to review existing zonings generally. The Council must prepare its LDP with the objective of furthering sustainable development;
- The preferred option lacks ambition. Adequate infrastructure is only one part of the consideration. Development should be steered away from sensitive areas. There is a need for integration of development with infrastructure including sustainable modes of travel to meet the legislative requirement of furthering sustainable development. There may be instances where the development is approved but the planned infrastructure is not yet in place, which would not further the principle of sustainable development. The LDP should not promote development of lands which would exceed environmental limits. It is unclear what is meant by 'available' - does this mean not yet developed or the willingness of the owner to sell/develop. If the latter, such availability of land can change over short time periods as a result in change of ownership. This could be a time-consuming exercise where the results/outcome have a short term validity;
- The RDS promotes growth of the hubs, so it is clear that there is merit in focusing the distribution of new housing to the Borough's hubs. However, it is also acknowledged that villages and small settlements should also be provided with an appropriate level of growth to help sustain the population and services in the rural areas. The POP does not refer specifically to Limavady in terms of the population and housing growth that is envisioned over the lifetime of the plan. However, it is mentioned in Discussion Paper 12 – Housing, and it identifies a revised housing allocation of 740 units (57 per annum) between 2012 and 2025. The Discussion Paper also advises that Limavady has a surplus housing capacity with respect to the identified target. The emerging plan for the Borough is to cover a period of 15 years and so the identified housing target for Limavady, and other towns in the Borough, will need to be revised again to cover this period (i.e. up to circa 2030/35 and possibly beyond, depending on when the plan will be adopted). In doing this, the Council should also take into account any unmet need that has accrued over the last decade/since the economic downturn and this should be factored into the quantum of housing land that is needed for Limavady. Table 6 of the Discussion Paper identifies that between 1st January 2012 and 1st April 2016 (4.25 years) 178 housing units were completed in the Limavady District. This equates to an average of 42 units per annum for the Limavady District which is below even the 57 units per annum target that is identified in Discussion Paper 12 – Housing for Limavady town alone. The POP advises that a review of the existing uncommitted housing zonings in the Northern Area Plan will be undertaken to determine if the zoned sites remain available and deliverable. This approach is welcomed by our client as it is considered that Limavady has been too reliant on small sites and sites which have not delivered through the lifetime of the Northern Area Plan 2016. It is also noted that some committed sites may be unable to deliver the quantum of housing previously envisioned, for example 1.1 ha of LYH13 is currently the subject of a planning

application for a new primary school and nursery unit (LA01/2018/0349/F). In addition to availability and deliverability, the Council should also consider the suitability of sites to deliver the type and scale of housing that is needed in Limavady and indeed the Borough as a whole. Housing Growth for the Borough;

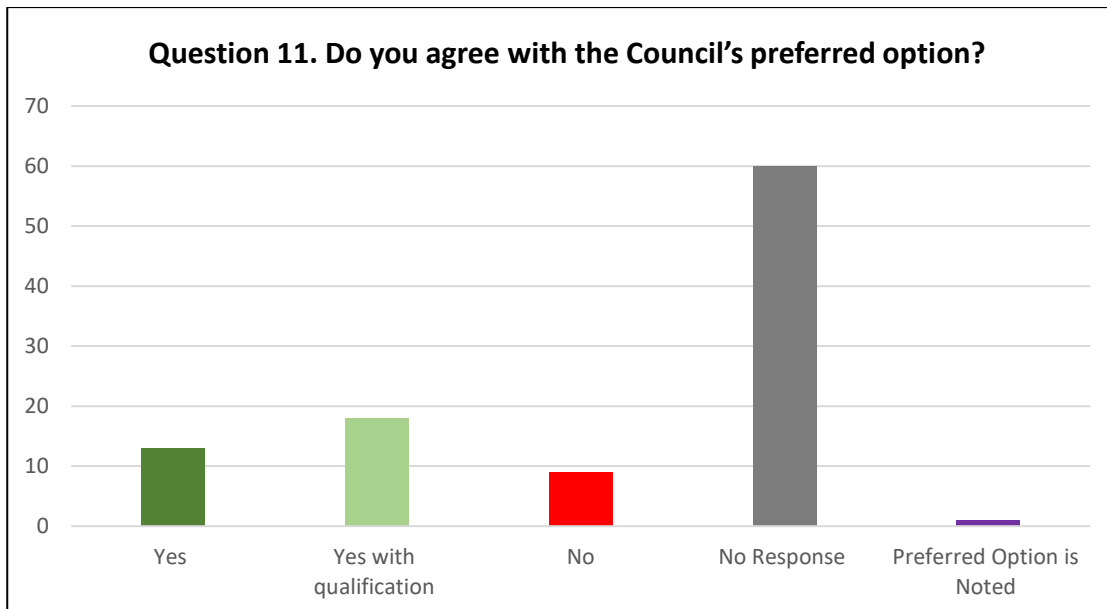
- It is noted that the POP references the Housing Growth Indicators (HGI) published in April 2016, which suggest a need for 515 homes per annum for the entire Borough. However, it would appear that the HGIs, which are explicitly used only for guidance and do not represent a cap on housing development or a target to be achieved, have not been tested. The HGIs rely upon past trends over a short-term period, which risks extrapolating misrepresentative demographic or market trends. The POP highlights significant volatility in the annual rate of housing development, but does not consider how this may have affected population growth or trend-based projections. Indeed, such local factors are highly likely to have contributed to the significant reduction implied by the latest HGIs, given that earlier figures – which drew upon trends recorded prior to the economic downturn – suggested a need for 947 dwellings per annum in CC&G. It seems that there is already evidence that the HGI is underestimating the level of housing provision that can be supported by the market, given that an average of 538 homes have been completed annually across the borough between 2012 and 2017. This is despite the rate of development in urban areas remaining some way below that achieved in stronger market conditions, prior to the downturn. We note that the above issues can be overcome through a process of sensitivity testing, which draws upon longer-term trends that are more likely to be representative of the cyclical nature of the housing market, and balance stronger provision against particularly low rates of development following the recession. This contrasts with the short-term period exclusively drawn upon by NISRA in developing population projections, and therefore HGIs. This sensitivity testing may result in a need to identify additional housing supply beyond land that is currently zoned or units likely to be developed through the rural planning policy regime. The POP claims that this approach could deliver around 16,000 homes (c890pa) which exceeds the latest HGI but falls below the earlier HGI of 947 dwellings per annum. A higher level of housing provision may also be justified by the need to maintain or grow the labour force, which is not considered within the POP. The Council, in the emerging plan, should evidence the level of job growth which is likely in the borough over the plan period, taking account of past trends, specific projects/investments and other economic opportunities. The labour force growth implied by the HGI or any sensitivity testing should then be estimated and benchmarked against future job growth, in order to more effectively identify whether the labour needed to support this growth is likely to be available;
- There is a considerable amount of zoned housing sites that have still to commence, whilst these unimplemented sites create an oversupply in specific areas there should be no de-zoning of housing land given the low build rates following the recession. This should be reviewed and if sites are not progressed, it may be appropriate to re-visit this aspect at a later stage. The overall thrust and direction of the Growth Strategy by focusing on improving and developing the road network whilst encouraging regeneration and investment in knowledge-based industries, education, retail and tourism;

- Portrush is particularly well served by transport (two railway stations and a harbour) and other infrastructural links;
- Agree with option. It will allow the Council to examine land on the ground against the various physical infrastructure provisions and how additional land may be included in the new settlement limits as appropriate development opportunity sites. The landowner would agree with Preferred Option 2 as this ensures appropriate policy consideration for all types of development with additional policy consideration for designated areas e.g. Areas of Outstanding Natural Beauty (AONB's), Conservation Areas etc. This will help shape development opportunities spatially to avoid, insofar as possible, demonstrable harm on these designated features;
- It will allow the council to examine land on the ground against the various physical infrastructure provisions and how additional land may be included in the new settlement limits as appropriate development opportunity sites.

4.2.7 General Principles of Good Design & Place Making

Key Issue: GP1: Promoting the General Principles of Good Design and Place Making

Preferred Option (Option 2): Provide policy applicable to all types of development with additional criteria applicable in our designated areas, e.g. AONBs, Conservation Areas, ATCs/AVCs, and ASSIs etc.



Summary of Dfl's Response:

- Acknowledge the preferred option. Encouraging to see that additional criterion are proposed to give enhanced protection to the Borough's designated areas. The absence of further details, however makes it difficult to comment further.

- Water & Drainage Policy Division: Consider the use of blue and green infrastructure to assist in improving amenity.
- Regional Planning & Policy Team: Note and welcome the Preferred Option 2.
 - Recognise that Council seeks to adopt and build upon SPPS core principles, in particular Supporting Good Design and Positive Place-Making.
 - Noted that LDP will take account of the SPPS and supplementary planning guidance documents 'Building on Tradition' and 'Living Places'.
 - Will consider further when more detail of the council's strategic planning policy approach and design guidance is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

- Special areas such as AONBs and ASSIs must be much better protected than hitherto and greater attention given to the enforcement of both new and existing sanctions imposed on those who flout the law;
- It is important to note that not all important habitats which require additional protections are designated. Ancient and long-established woodlands have a very high biodiversity value, as well as providing vital habitats for protected species such as badgers, red squirrels or buzzards. Ancient and long-established woodlands in NI are the last remaining remnants of ancient forests that used to cover the island, as such they provide an important historical and cultural link (briefing paper provided);
- Support the approach of developing a detailed set of General Principles that would apply to all development throughout the Borough and include the 10 qualities contained within the Living Places document. Support provision of additional criteria for AONBs, Conservation Areas and Areas of Townscape Character. Highlight that design is not limited to the appearance of a building or place but should also encompass how buildings and places function in use while good place-making should encompass techniques for managing and maintaining those spaces – urban stewardship. LDP should support development proposals where design also supports health and wellbeing and enhances quality of life; incorporates, where possible, green infrastructure, and opportunities to support wildlife, and contributes to net gains for biodiversity; responds to the climatic change, and is adaptable to changing climate. Design principles should give recognition of the importance of significant views or landscape setting of the natural and built environment (e.g. listed buildings, historic parks and demesnes, and our WHS);
- Special areas such as AONBs and IASSIs must be better protected and greater attention given to the enforcement of new and existing sanctions imposed on those who flout the law. Also we have lost too many examples of our built heritage e.g. Pre Famine Ice House that CANNOT be replaced;
- Caution the Council that, before agreeing this option, to consider what essential resources lie within or importantly beneath designated areas such as essential minerals and aggregates that are required to meet other objectives set out within the LDP. Minerals and aggregates can only be extracted from where nature has placed them and to take a decision that would "sterilise" these resources could have serious consequences for the supply of materials to housing and infrastructure maintenance

and development within the Borough. Strongly recommend the Council consult with the DfE to determine the extent of aggregate and mineral resources within the designated areas. Suggest reference to the Minerals Section of the Newry Mourne and Down POP. Also refer to the EU Guidance on the management of Non Energy Extractive Operations within designated sites - show how the needs of extractive industry can be met while avoiding adverse effects on wildlife and nature. They examine how the potential impacts of extraction activities on nature and biodiversity can be minimised or avoided altogether. They highlight the importance of strategic planning, the appropriate assessment of new developments, and the need for adequate mitigation measures. The guidelines contain many examples of best practice, and show how some extraction projects can ultimately be beneficial to biodiversity by providing highly quality ecological niche (web link provided);

- Suggest strongly that local developers and other stakeholders are involved in the process of designing the General Principles;
- Welcome the strong guidance on good design and place-making, given the generally poor performance in the past. Suggest that reference should also be made to orientation of development to take full advantage of passive solar effects, as recommended in the SPPS;
- LDP should accord with NI regional and planning policy as expressed through the RDS and PPSs;
- Welcome inclusion of acknowledging the use of heritage assets for positive place-making (6.27), however, disappointing that State Care Monuments and Scheduled Monuments were not mentioned here. An important opportunity has been missed, in text or photographic, to give POP a stronger sense of local identity, distinctive character and authentic place, e.g. Dunluce Castle; Holy Trinity Church, Ballycastle; and similar heritage assets could have been used to highlight how they feed into a sense of local identity in communities. The Borough has quite a dramatic sense of place, along the coastline particularly and this is not well articulated. Acknowledge the development of a suite of general policies for good design and place-making. However, remind council the full suite of policies in PPS6 is set to protect and conserve the historic environment – appropriately applied with planning applications the result will enhance the design outcome and consequently, aid place-making. Therefore, any policy preference must be in line with the SPPS strategic objectives towards protecting, conserving and enhancing both archaeology and built heritage assets. Care must also be taken not to create a conflict with specific policies around the historic environment. Additional evidence to aid local identity is “A Sense of Loss, the Survival of Rural Traditional Buildings in N. Ireland” (published by then Environment Heritage Service) - highlights importance of rural vernacular architecture (non-designated structures and buildings) as a distinctive character trait in NI and how through inappropriate planning policies, alongside other factors, these authentic structures are being lost. The LDP is the opportunity to re-address this problem. Any policy framework to guide design and place-making should have the contribution of the historic environment at its core. The historic environment, and collective heritage assets, have a particular role to play in the promotion of cohesion and inclusivity. Also an opportunity for retention and re-use of vacant heritage assets (buildings and sites, particularly Built Heritage at Risk) and by promoting their re-

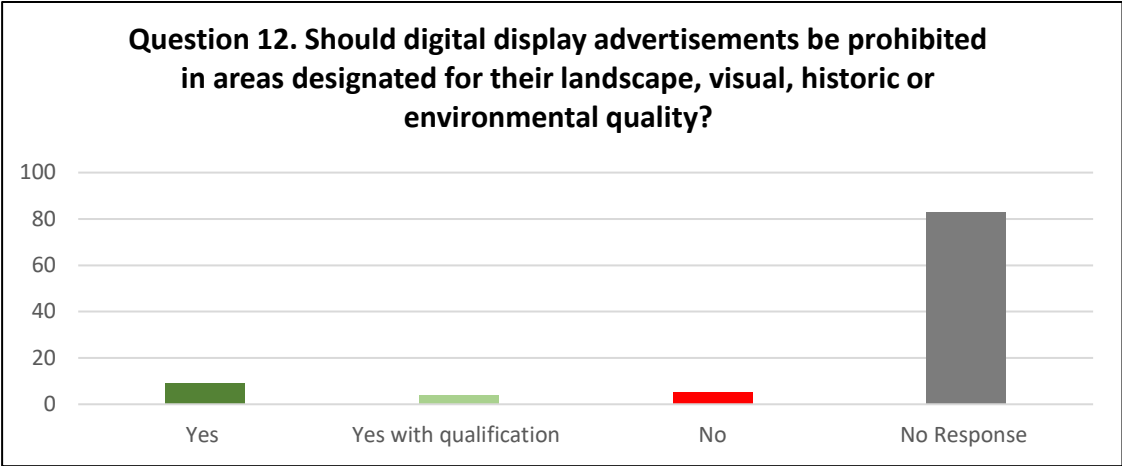
use in the LDP, vitality, a sense of (authentic) place, local identity and distinctive character could be encouraged in the various types of settlements;

- Some consideration should be given to planning policies that would allow for control over the siting of HMOs in order to avoid future HMO clusters that lead to antisocial behaviour problems;
- In recent years planning permission has been given for a disproportionately large number of apartments and townhouses in the village of Castlerock - clearly designed to be holiday homes - second homes. This further damages the village. Without residents who shop and use services here all year round the economic viability of local businesses is fragile. The design of these relatively new apartments and townhouses is a real problem. They do not meet the need of local residents for accessibility and full time occupation. The multi-storey apartments do not have a lift, thus excluding those who are downsizing for disability, health or future-proofing reasons. Room sizes are often geared to maximise the number of units, not to make a full time home. A recently completed complex in Castlerock has two bed apartments where the second bedroom is over 10' long but only 6'1" wide. That is not a viable bedroom for full time living. In the same complex some living rooms have space for a dining table or a sofa but not both. Presumably these new builds meet the current building regulations requirements for room size, disabled access etc. This only proves that the current criteria are inadequate for the needs of the population;
- Council must always return value for the rates money given;
- Penalises those living in AONBs, Conservation Areas, ATCs/AVCs, and ASSIs. Possible third alternative which allows for protection of these areas with flexibility for extenuating circumstances to be accommodated;
- Additional policy guidance for designated areas appropriate. However, overall function of towns and rural areas should not be frustrated by overly prescriptive policies;
- No need to tighten design related policies. Development Management process can ensure quality design, in association with experienced architects;
- Must pursue excellent design, not just 'good' design because good is contextual with mediocre. Ensure planning applications are advanced with excellent design quality and that poor design is rebutted. Consider that documents referred to within this assessment are rarely referred to when processing planning applications;
- Supportive of this approach – ensures RDS & SPPS Core Principles set out in the LDP;
- Strongly opposed to the preferred option as it will be unduly restrictive to renewable energy developments. The introduction of a spatial approach with a series of landscape designations, protection zones, restricted heights and buffer zones as proposed, will serve to essentially sterilise any potential development opportunities in the Borough. Decisions on renewable projects should be made on a case by case basis. Any move towards a spatial approach must be evidence based and consistent. It is unclear how the proposed landscape character assessment will relate to the existing 2000 LCA series, or if there will be a co-ordinated approach with other councils. There is a need for regional direction/co-ordination on this matter;
- The preferred option could go further in delivering for people and nature. The protection and enhancement of urban biodiversity can be achieved through careful planning and development, which aims to protect and enhance biodiversity on sites,

and enhance connections between ecological features within and across sites. Recognition that good design can help encourage wildlife should be recognised. By planning for nature and green space in our neighbourhoods, we can improve our health and quality of life. Including biodiversity features into schemes adds to the attractiveness and appeal of regenerated areas (as per the SPPS). Policy and guidance should advocate that good design and place making should include the area around a scheme i.e. its immediate environment. Furthermore, it should include a guiding principle which allows for the avoidance of development that impacts adversely upon natural ecosystems. There is recognition of well-being through wildlife, and four documents are referenced for further information including suitable principles and good practice guidance. Some of the substantial mental health challenges facing society could be addressed by increasing physical activity in green settings, as supported by RSPB Ni research. Design and layout features to incorporate biodiversity are outlined. Brownfield sites are often havens for wildlife, and any policy on such land should not apply where it would conflict with other relevant policies. The LDP should steer development away from sensitive areas. There is no evidence of how the LDP proposes to utilise urban design to mitigate and adapt to Climate Change, as per the SPPS - these measures should be incorporated into the LDP if it is to truly further sustainable development. All new development should be zero carbon as any new development built now will only add to the scale of the retrofit problem that will need to be addressed by the 2040s and the net zero emissions requirement. Reference is made to the Kingsbrook development in England where the aim is that wildlife will thrive throughout the development and people will benefit from living, working and playing close to nature;

- Lidl require positive engagement with the Council to achieve their development ambitions. This requires flexibility in relation to environmental issues such as parking standards and clear design guidelines so that they know what is expected of them at an early stage. The LDF can go some way to addressing all of these issues;
- Good design principles should be promoted and encouraged and design solutions appropriate to the setting and distinctive characteristics of the location and a sense of place. Retail NI would comment that a greater emphasis on place-making and design will result in a high quality-built environment for all, which should be encouraged across the Borough. Whilst design guidance can assist it should not be overly prescriptive or constraining. Design & Access/Concept Statements for developments should really be common practice in all circumstances, as it assists with the rationale and understanding behind the proposal. The preferred option is supported. The Plan should seek to identify areas with specific characteristics or other important features and safeguard them as they create a sense of place and contribute to the tourism of the district;
- Broadly agree. "Enhanced protection" however should not mean overly prescriptive rules and restrictions. The emphasis should be on conservation which usually requires an appropriate level of sympathetic development;
- The preferred option ensures appropriate policy consideration for all types of development with additional policy consideration for designated areas e.g. AONBs, conservation areas, etc. This will help shape development opportunities spatially to avoid, insofar as possible, demonstrable harm on these designated areas.

4.2.8 Control of Outdoor Advertisements – Designated Areas



Summary of Dfl’s Response:

- Council acknowledges evolving technology associated with the digital display of adverts and gives regard to the benefit that signage and advertising can provide for the local economy. Council proposes to mirror the strategic position set out in the SPPS, however no options are generated to confirm this approach. POP questions suggest that some options could have been generated. It is also noted that the Council intends to retain the current policy approach with possible amendments in regard to non-static signage located within Areas of Village Character (AVCs). Without precise policy wording, it is difficult to comment further.
- Dfl Roads - The advancements in advertising technology are recognised however their location and placement have to be carefully considered and balanced especially in relation to visual intrusion and road safety.
- Regional Planning & Policy Team: Note the section but would comment this essentially replicates the strategic position of the SPPS. This section as it stands does not provide any indication of local policy for the plan area.
- POP does not provide any options or policy direction for the Control of Outdoor Advertisements.
- PPD will provide further detailed assessment when more detail of the council’s strategic planning policy approach is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

- The use of advances in technology can only be a benefit. Many emerging technologies exist which will directly benefit the planning system, the concept of smart cities for example. Whilst we must respect the historic/landscape value of our environment it would be highly inappropriate, and perhaps prejudicial, to limit the use of certain technologies in certain areas;
- Visual impact - it would spoil the landscape with the risk of putting off tourists;
- Given the distinctiveness and high value placed on the Borough's natural environment for scenic, amenity, tourism value and the fact that advertisements are not location/site dependent, oppose any unnecessary signage that would have a detrimental impact on

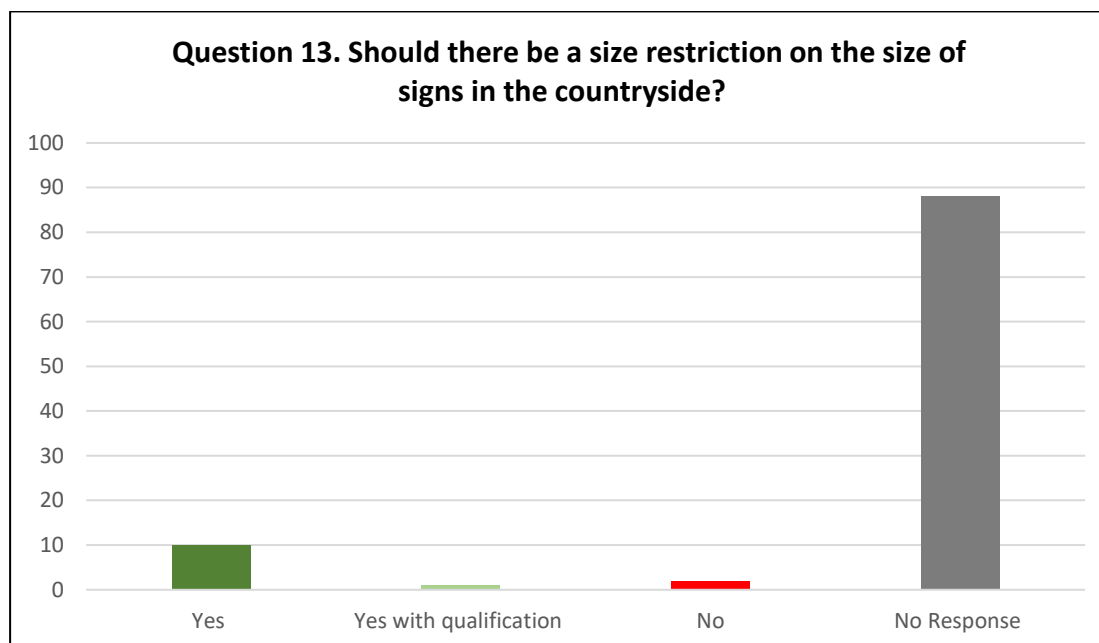
the enjoyment of the natural environment. Should be of an appropriate size, scale, and design to complement the wider landscape not compete with it. Given the associated infrastructure needed for digital signage, do not feel it is appropriate in areas designated for their landscape, visual, historic or environmental quality. Not appropriate for important habitats or sensitive sites that are not designated. The Woodland Trust provides appropriately sized wooden signage at all of its sites, to ensure visitors are informed of site specific information and so as not to compete with the visual amenity of the site;

- Such advertisements are visual pollution as well as causing distraction;
- Such developments run counter to the commitment to protect designated areas as expressed in the RDS, the SPPS and in PPSs 2 and 6. Given the importance of much of our natural and built heritage in driving and supporting our tourism industry, probably the backbone of the local economy, such advertisements would inevitably be seen as intrusive by visitors and would provide significant negative feedback, to the detriment of the industry;
- Welcome acknowledgement that the LPD can set out local advertisement policies for listed buildings, including heritage assets, but SPPS sets out that a separate 'Control of Outdoor Advertisements' is to be provided rather than 'allows' for such a policy as per POP. Therefore, consider reference to 'historic' in Q12 could be omitted and included in a historic environment and/or heritage asset policy or that clarity needs to be provided as to what is meant to the use of historic in the context of such a policy. There is an opportunity to include internal advertisements (illuminated or non-illuminated, moving, static), set behind the shop window and so on, can have a detrimental impact on the character of a heritage asset (designated or non-designated) or its setting. The SPPS sets out a clear distinction and a hierarchy within its policy direction between alterations/extensions to a listed building, advertisement on a listed building, different from advertisement elsewhere and demolition of a listed building as separate from works within Conservation Areas (CA) and Areas of Townscape Character (ATC), e.g. (generally) policies relating to CA and ATC are concerned with enhancing or preserving – a lesser policy test than required for Listed Buildings (protect, conserve and enhance). The wording of SPPS retains a clear hierarchy and separation between these groups;
- Inappropriate signage will detract from the appreciation of an area which is designated for landscape or visual quality;
- Signage is very important in announcing or directing members of the public to commercial premises and businesses. Given the global shift to online and mobile retailing, many businesses are suffering. It is therefore not unsurprising that digital display advertisements, where the messaging can be altered quickly to reflect the available offers or which can enable greater interaction with consumers have been a significantly increasing trend in the last 5 years. Good planning policies ensure a balance is struck, by taking account of new and emerging technologies, whilst ensuring it does not negatively impact on the historical or landscape quality and setting. A blanket ban on digital advertisements in designated areas is not an appropriate response and proposals should continue to be considered on an individual basis taking account of their size and context. Likewise, in the countryside a sign that forms part of a commercial building will be less visually intrusive than a standalone or totem sign.

Overly prescriptive policies limiting the size and dimensions take no account of context and should be resisted;

- Each proposal should be considered on a case by case basis. As technology moves quickly the LDP should not place undue focus on "digital display advertisements", when other forms of advertising and new technologies may come forward during the plan period.

4.2.9 Control of Outdoor Advertisements – Size Restriction in the Countryside



Summary of DfI's Response:

- No response.

Summary of Other Responses:

- Each application should be assessed on its own merits. Size is only one factor for consideration, colour, materials and levels of illumination are equally important. Advertisements which benefit from planning approval are generally tasteful and appropriate to the location, it is unauthorised advertising which causes harm and this should be addressed by appropriate enforcement action;
- Visual impact;
- Large signs distract motorists and often obscure essential safety signs, such as road signs etc;
- Possibly, but up to CCG to assess in context of SPPS;
- Yes, large signs are really visual pollution. They distract motorists and often obscure essential road or directional signs. In addition they often block views for visitors;
- Would go further and suggest that such advertisements are essentially urban in character and have no place in the countryside. Numerous planning policies have reiterated the need to retain the character of rural areas, but there seems to be a

relentless drive to urbanise them, and this would be a further step in the wrong direction;

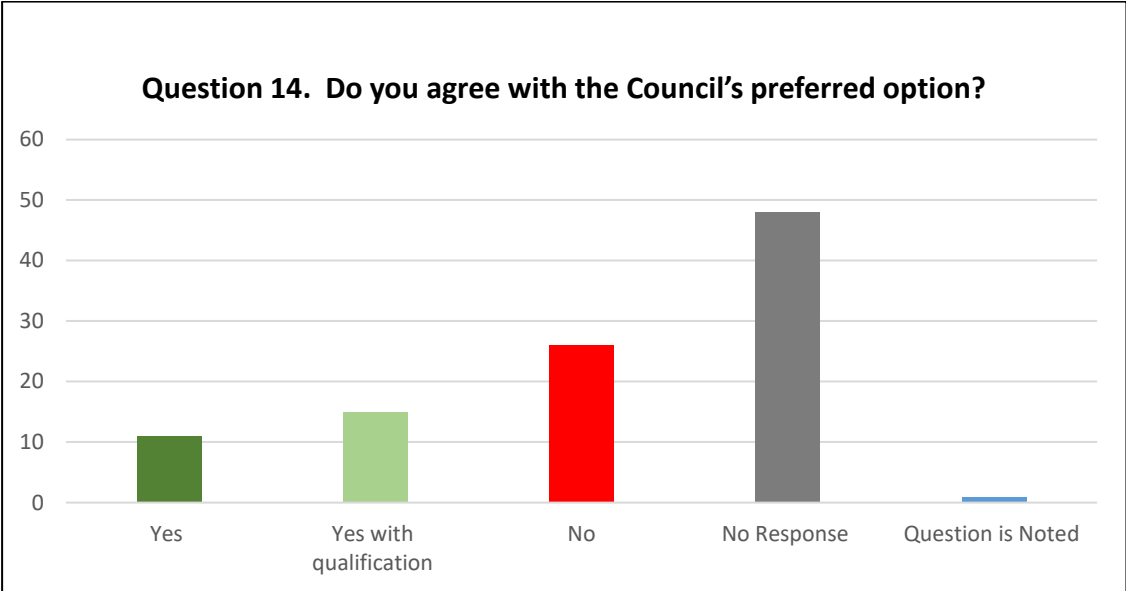
- Consider it appropriate for council to review and to rationalise the size of signage in the (open) countryside. There is an opportunity to review the permitted development rights around 'mobile' signage;
- Each proposal should be considered on a case by case basis.

4.3 SOCIAL OPTIONS & COMMENTS

4.3.1 Housing

Key Issue: HS 3: Approach to the Split between Urban and Rural Housing

Preferred Option (Option 2): Review the principle of the existing policy framework.



Summary of DfI's Response:

- Welcome the focus on sustainable residential development in the countryside, it reiterates that the LDP should bring forward appropriate policies and proposals that reflect the aims, objectives and policy approach of the SPPS, tailored to local circumstances.
- Welcome evidence presented in relation to the distribution of the Borough's population by settlement type, remaining housing capacity, housing completions and urban and rural build rates. Council correctly indicates that the HGI for 2012 – 2025 has been revised downwards when compared to the 2008 based HGIs. When extrapolated to 2030 on a pro-rata basis the figure is 9,270. The Council is reminded that the HGI is an estimate of the new dwelling requirement. It should be used for guidance rather than being seen as a cap on housing development or a target to be achieved.
- Council is reminded that the new 'soundness' based approach will examine the soundness of the plan 'in the round' by reference to the evidence presented in support of the plan policies and allocations. The absence of objections on a particular issue may not therefore prevent the Commission from considering any aspect that goes to the Soundness of the plan overall.
- It is noted that there is a potential for an additional 16,000 units based on lands zoned for development in settlements and the amount of housing potentially deliverable in the countryside under current rural housing policy. This figure is approximately 70% higher than the HGI (pro rata to 2030). The POP acknowledges that this is 'significantly' higher than the HGI. Query what consideration has been given to the issue of aligning the housing need more closely with the available housing land allocation in the plan?

Welcome a review of existing NAP uncommitted housing zonings to determine if sites remain available and deliverable. The results of this review may help inform the Councils proposed approach moving forward.

- Council is reminded of the SPPS requirement to make an allowance for windfall housing that may come forward on un-zoned land within settlements over the plan period. This could be informed by an analysis of the proportion of units that have historically come forward from this source, or the outputs of urban capacity analysis of main settlements.
- DfI Roads - Wording is the same for Options 1 & 2. Additional housing allocation for villages is likely to create pressure on existing infrastructure and necessitate improvement schemes. Funding and procurement of these schemes would need to be allowed for by developer delivery or within developer contributions. Lands for zoning should be fully assessed with appropriate key site requirements applied.
- Regional Planning & Policy Team: The housing policy has been informed by the criteria outlined in the SPPS, with future growth concentrated in the main hubs (as outlined in the RDS) – this approach is welcomed.
- The site selection of new housing zonings in settlements of over 5,000 population should be on the basis of a methodical sequential approach, consistent with that outlined in the SPPS.
- HGIs have been clearly referenced and used as a guide for new dwelling requirements.
- All projected housing growth will be focused in the already identified hubs and as such this is consistent with both the RDS and SPPS.
- The preferred option (HS3) addresses the split between urban and rural housing with the Council preferring to review the principle of the existing policy framework. Allows the distribution of new housing to reflect better the RDS focus for growth of the Borough's hubs, whilst protecting the integrity of the countryside – this option is welcomed.
- The HGI for the council area is referenced (DFI figure of 6,700 which the Council have extrapolated to 9,270 to the year 2030).
- Remaining housing capacity equates to approximately 13,000 units (uncommitted housing zonings) and rural build rates could possibly generate 3,000 additional units over the remainder of the Plan period (2030).
- The figure of 16,000 therefore far exceeds 9,270 as identified by the Council. All councils are by now aware that the HGIs are for guidance, they are not a cap or a target to be achieved. Set within that context, the Council's actual housing allocation/strategy should be clearly articulated, based on robust evidence and the local context where appropriate.
- Given the context of high levels of planning permissions for housing in the countryside, the preferred option for Urban-Rural Split (Review the principle of the existing policy framework) is welcomed as it aims to focus more growth in the Borough's hubs. In theory this could lead to a step change in approving housing in unsustainable locations.

Summary of Other Responses:

- More provision for housing. Figures provided are not realistic in terms of growth and building rate. The recent completion rate in Dungiven is not a true reflection of need but that no land is available to purchase which has seen a lot of families move away;
- Only focusing on designations to identify sites that need protection from development is erroneous as ancient and long-established woodlands are undesignated. Compensation or mitigation planting is not appropriate or acceptable. Small developments such as those associated with housing are clearly not spatially dependent or of regional significance. There is no reason why these should be located where they will cause damage or loss to ancient or long-established woodland. They should be protected from unnecessary or inappropriate development. The additional inclusion of a 50m buffer zone around these woodlands will ensure sufficient protection for these habitats, the resilience of the woods and their existence in to the future;
- Allocation of Housing Growth Indicator of 9,270 units across the Settlement Hierarchy and the countryside is noted;
- The denuding of the countryside is a matter of concern which needs to be discussed as Option 2 suggests but infrastructure and transport facilities must also be provided. A holistic picture when making decisions is essential. Refute the data on Table 13 as being out of date, Castlerock now 32%, and Portballintrae 58%. Empty streets mean isolated (often elderly) people as is characteristic of our demographic. Also consideration must be made of the transient student population in Portstewart;
- Option 1 should be chosen as we shouldn't encourage the death of our rural areas, 31% of our population live in rural areas and there are many social, health and physical benefits to living in the countryside and we shouldn't prevent this happening;
- Increasing housing and development that are more suited to urban or existing settlements endangers the sustainability of rural industries like minerals, agriculture and renewable energy that are best placed away from housing. We would further comment that if the Council is to achieve its objective to deliver the requirement for 9,270 housing units for the whole Borough up to 2030 then it must identify where the construction materials that will be required locally for this number of houses will be sourced. The construction of an average size house requires approximately 60 tonnes of aggregate. 9270 homes will require 556,200 tonnes of aggregate. The question must be asked if this quantity of material will be sourced from local quarries creating local employment and making a contribution towards the Councils rates income or will it come from outside of the Borough. Will the Council assess the current and future aggregate resources within the Borough and take steps to safeguard such resources?
- Local social, community, cultural, heritage and historical considerations mean there should be a more relaxed policy in terms of housing in the countryside particularly for local people;
- HGIs are guidance not a cap. The POP does not state if the HGI figures includes the projected social housing need. The social housing need is a 5 year period not 15 as per the plan period. If the social housing provision were included over this timeframe, it would result in a revised housing growth figure of 11,046 dwellings. Would be prudent of the council to take cognisance of the plans of neighbouring councils and allow for a

margin of unexpected growth resulting from cross-boundary relationships. Suggest that a further 15% of housing growth is planned resulting in a further 1,657 units, taking the Borough's figure to 12,703 dwellings. This uplift would also ensure an adequate supply of housing for 5 years beyond the plan period and be in line with the Act. Suggest the POP's assumptions are flawed as it assumes all uncommitted zones sites will come forward, housing from countryside could be used to meet housing demand is not a sound or sustainable approach as these are effectively windfall sites. Evident a shortfall in supply over the plan period is highly likely, therefore there is a need to zone additional land. Agree in principle with the preferred option re hubs and towns. However, suggest, based on geographical size, that the top 9 small settlements (0.01 sq.km or greater) should receive 50% of the share (255 units) and the other 50% (254 units) should be divided amongst the remaining 25 small settlements below this threshold. Evident a shortfall in supply over the plan period is highly likely, therefore there is a need to zone additional land. Agree in principle with the preferred option re hubs and towns. Classifies Armoy as a Town and suggests there is a need to ensure it develops evenly. Suggest remaining uncommitted zonings cannot be relied on to deliver the projected housing need. Suggests Armoy should have an allocation of 76 units, based on apportioning 1,905 dwellings from the suggested housing allocation figure. If the existing zonings are built, there remains a shortfall of around 51 units in Armoy. Both primary schools have almost doubled in the last 7 years, and suggests this growth would have been higher if there was sufficient housing to keep young families. Suggests there has been an exodus of families to hubs of Ballycastle and Ballymoney to educate their children. Lists a number of services, facilities and local employment in the village indicating it is a thriving village. Suggest the allocation of 76 dwellings is a starting point and other growth factors should be considered also;

- The figures presented in Table 11 are highly misleading, giving the impression that there has been little or no change in rural house building over a long period. The timeframes presented are not the same across the table, the first two columns overlap, and there is a period not covered between 2010 and 2012. Presenting data in this form is not helpful, and raises suspicions that there is something being concealed. A more detailed yearly analysis would have been much more informative and accurate, and would not have been more difficult to produce;
- Para 6.37, 3rd bullet point – consider the word re-use should be included in the text in lieu of 'recycling', e.g. in certain contexts recycle could be interpreted as enabling demolition (in the case of listed buildings). Re para 6.40, seek clarity on what criteria would be used in defining when a building is "suitable". Many disused vernacular and industrial heritage assets are capable of sympathetic conversion, sympathetic extensions and sustainable reuse. Acknowledge proposed approach to focus housing growth into the Hubs, in alignment with SPPS. However, as per Q10, advise caution and highlight that the council must utilise the historic environment evidence bases, datasets etc. to assess impact of zonings and for informing potential mitigation such as designation or key site requirements, i.e. to ensure any zoning takes due regard of the historic environment and the heritage assets. In the urban context there is an opportunity for policy consideration, by offering preference to utilising historic properties, including industrial heritage, for housing in advance of new build to promote

and maintain attractive and distinct places to live and invest. However, any policy preference must be in line with the SPPS strategic objectives towards protecting, conserving and enhancing both archaeology and built heritage assets. Important to understand that the (open) countryside is inseparable from the historic environment and forms the immediate and wider rural setting of heritage assets – both well and lesser known, and those not yet identified. Therefore, the historic environment and the setting of heritage assets often share common pressures with regard to sensitivity to development, such as impacts on setting, removal of assets or impacts on previously unidentified below ground archaeological remains. This should be reflected in scoring consideration at SA;

- There is conflict in some of the figures as different time periods are used, and no commitment given in respect of the preferred approach around the most recent HGI, the LDP period and existing zoned housing sites in the NAP. Consider the LDP timetable is optimistic and LDP should cover period to 2035, to ensure at least 10 years between adoption and notional end date. The HGI figure should remove the five years from 2012-2017 as these have passed and are accounted for in the housing monitor figures. Note there appears to be a significant over-capacity of housing when compared to the HGI. HGI figure is too conservative based on the LDP period being too short, lack of 5 year land supply to ensure adequate supply to the end of the plan period and the pessimistic nature of the HGI based on a recession period. Significant that the HGI pa figure of 515 is already below the build rate for 2012-17 of 538 units pa, which includes the last few years of the recession. Is very likely the figure will continue to climb going forward. Build rate in the rural area is clearly at an unsustainably high level. A perverse situation where the rural build rate equals or exceeds the rate for all settlements combined. Reducing the rural build rate will have many beneficial effects from a visual and landscape perspective, but also reduce pressure on services resulting in more demand for housing in settlements, which is the preferred option in SG1. Agree with the preferred option, but consideration must be given to the effectiveness of introducing more restrictive policies in AONBs. The annual rural build rate of 270 units pa would have to be reduced by at least half to tilt housing development towards settlements in a meaningful way. Reduction in rural housing will only be successful if meaningful policies over a significant area of the Borough to constrain substantially the number of dwellings. If not, further pressure will be applied to local services and the council will fail to meet its preferred option;
- Housing allocation is sufficiently important to have its own key issue, as is the case in the majority of the POPs issued by other Councils. While there is general support for the Council's preferred option there is concern with regards the methodology used to support the housing figures. There is conflict between housing allocation figures as some span different time periods and no commitment is given by the Council in respect of their preferred approach around the most recent HGI, the LDP period and existing zoned housing sites within the NAP. The 2016 HGI pro-rata figure of 9,270 dwellings stated by the Council is misleading in the context of the other figures stated. Suggesting that there is significant over-capacity of housing when the existing availability of housing land in the settlements and the build-rate of rural housing are added and compared to the predicted need based on the HGI. However, we believe that the HGI figure is too

conservative based on both the LDP period being too short, the lack of a 5 year lands supply being incorporated to ensure adequate supply to the end of the LDP period and the pessimistic nature of the HGI as it is calculated based on a period that spans the worst recession in recent memory. Overall remaining capacity for housing in the NAP settlements must be qualitatively reviewed both in terms of the likelihood of it coming forward for development during the Plan period, the realistic amount of housing that individual sites will deliver and the split of housing between settlements and between tiers on the settlement hierarchy. When this exercise is robustly carried out there will be a need for additional housing land to be allocated to Limavady; Reducing the build-rate in the rural area will have many beneficial effects on the Borough both from a visual and landscape perspective, but also from the perspective of reducing pressure on services and resulting in more demand for housing in settlements, which is the strategic direction sought in the preferred option for Key Issue SG1. Further work is required by the Council to fully explore the proposed housing allocation for the Council area and that a simple reliance on the 2016 HGI figure would not be appropriate;

- On page 45 of the POP "Housing Growth Indicators", the Council indicate that they plan to allocate housing growth in line with the revised HGI's for NI produced by DfI (2016). These figures are guidance rather than a cap. Therefore, the Council have flexibility to move away from HGI figures rather than slavishly adhere to them and many other councils have taken advantage of such flexibility when forecasting future housing growth. The HGI figures project that 6,700 dwelling units will be required for the CCGBC area for the period 2012 - 2025. However, as the HGI figures are only projected until 2025; in order to determine the projected housing growth figure until 2030 (for the length of the plan period), the Council have extrapolated the HGI figure and calculated that a further 2,570 dwellings are predicted over the remaining 5 year period, giving a total allocation of 9,270 dwellings. Not if the proposed housing growth allocation figure of 9,270 units includes the projected social housing need for the district between 2017 and 2022 (592 units). Furthermore, the projected social housing figure is only based on a 5 year period and in order to align with the 15 year plan period, the overall social housing demand should be 1,776 units (based on a pro rata calculation). Assuming the housing growth figure does not include the units required for social housing, it would take the Council's overall housing growth figure to 11,046 dwellings;
- Section 6.56 of the POP states that Council considers that the distribution of the remaining housing capacity in the hubs, towns and villages would (inter alia) provide potential future housing development in the small settlements in line with their population. The NAP 2016 SDL around Drumagarner has restricted meaningful development opportunities for any housing within the hamlet. The resultant high number planning applications for one-off dwellings within surrounding rural area would strongly indicate a desire for members of the local community to remain within the area. The Council should seek to accommodate the needs of growing families by providing more development opportunities within the hamlet. Development that is proportionate to the existing settlement would also reduce pressure for one-off development within the rural area and contribute to sustainable development and the aims and objectives of the RDS;

- Alternative Methodology suggested using approximately 15% further growth in the area used to recognise inter-relationships between adjoining councils. Therefore HGI should be 12703. POP para 6.43 on page 46 - based on uncommitted housing zonings identified in the NAP, the remaining potential housing capacity equated to approximately 13,000 extra units. In addition to this, the council argue that based on past build rates for housing in the countryside that a further 3,000 units could be delivered for the Borough over the remainder of the plan period (based on 12 years). In total the council suggest that 16,000 units could be provided during the life of the plan. We would also suggest that it is flawed to assume that all uncommitted zoned sites will be brought forward for development. Furthermore, the suggestion that approvals for housing from the countryside could be used to meet housing demand is not a sound or sustainable approach as these are effectively windfall sites. Based on the above rationale and considering the councils preferred option, it is evident that a shortfall in the supply of housing is highly likely over the plan period. There is therefore a need to zone additional land for housing within the district. Re: Distribution of Housing Land. We agree, in principle, with this preferred option. However, when it comes to apportioning the 30% of the allocation to the towns, we would suggest that this should be weighted in accordance with the respective population of each settlement (figures provided). Re: Housing Growth in Portrush. Alternative figures put forward regarding potential growth and potential allocation for Portrush. There are a number of zonings for residential development in the extant plan for Cloughmills. The majority of these zoned lands have either been built out, are committed for development or no plans have been submitted to develop the lands over the lifetime of the extant area plan - suggesting that these lands may remain undeveloped in the future and therefore cannot be relied upon to deliver projected housing need. We agree, in principle, with this preferred option that the main growth should be allocated to the Hubs and Towns as it aligns with the aims of sustainable development and accords with regional policy direction. However, when it comes to apportioning the 4% of the allocation to small settlements, we would suggest based on geographical size that the top 9 small settlements (those 1.1 sq. km or greater in area) should receive 50% of the share and the other 50% should be divided amongst the remaining 25 small settlements falling below this threshold (see appendix 3 for clarification). Re: Housing Growth in Knocknacarry. Alternative figures put forward regarding potential growth and potential allocation for Knocknacarry;
- The constraints on development in the countryside and possible further constraints will force people who wish to live in the countryside into the settlements. In order for this to be achievable and to aid in the reduction of sporadic development in the countryside the surrounding settlements should be expanded. Specifically where the infrastructure and amenity exist and therefore allow for additional development as identified on the lands attached;
- Option focuses growth on Borough's hub. More housing needed in Dungiven. Losing population to Maghera, Derry and Limavady because no available housing in Dungiven. Essential that local towns have land zoned for housing;
- Option 2 is unsustainable. Conflicts with SPPS and RDS in that required additional constraints upon development in countryside would run contrary to objectives to

sustain a living and working rural area. More sustainable option is to regard HGI allocation as principally an urban housing requirement, and discount all or significant proportion of potential rural housing from HGI allocations. HGI figure is a guide and not a cap. Remaining housing capacity figures set out in Population and Housing Paper 2016 appear to be an overestimate as may be based upon lapsed approvals and/or are unlikely to be delivered. Capacity must be assessed on basis of sites which are likely to be delivered. Plan Strategy should not allow settlements with significant housing land available to frustrate growth of other settlements where housing demand consistently higher, subject to environmental conditions. In other words, over supply in certain areas should not be a reason to prejudice growth opportunities in settlements (e.g. Limavady and Castlerock) where there is a proven housing demand, subject to environmental conditions. Noted that Housing Potential figures in the Housing Paper may be based upon lapsed planning consents or higher density approvals which may no longer be implemented. The house potential figures in all settlements should be tested for deliverability. (Maps attached showing potential land suitable for development in Limavady and Castlerock);

- Agree with Option 2 as it broadly aims to direct new housing within existing settlements (particularly within hub settlements such as Coleraine), along with the ability to control further housing development in the countryside that better reflects the RDS focus for growth of the Borough's hubs. It advocates a sustainable approach to future housing. POP does not set out housing allocation figures for individual settlements, rather a Borough-based approach has been taken. It is considered the revised HGI figures published in 2016 are overly restrictive and will stifle house building over the Plan period. The overall quantity of housing should be uplifted and reflect a level of growth potentially available under the NAP and taking account of original HGIs published within RDS 2035. The figure stipulated within the POP for a total of 9,270 dwellings is based upon revised HGIs which were not subject to public scrutiny and influenced by a period of deep recession. These skewed the level of projected housing growth across NI due to abnormal and all-time record low levels of growth;
- Agree with Council's Preferred Option 2 that would allow the distribution of new housing to reflect better the RDS focus for growth of the Borough's hubs that would include Coleraine;
- Agree with Option 2 - should allow distribution of new housing to better reflect RDS. Dwellings in the countryside - needs to be assessed, taking into consideration matters such as designated landscapes and the sustainable development principles of continuing to allow significant numbers of single dwellings in the countryside. POP Option 2 justification listed. Hence, to not review the principle of the policy regarding urban/rural split could lead to permitting the provision of dwellings in the countryside that accounts for a recent annual build rate equivalent to that found in the Borough's settlements. This is unsustainable. Several aspects of the POP which are for consideration and debate at the Plan Strategy stage. There are no questions posed by the POP on these matters. The HGIs were revised downwards between the period from 2012-2025. This is a lower growth than is presently available under the Northern Area Plan 2016. The interrelationship between the HGIs, the Northern Area Plan 2016 and the LDP information proposed will require careful consideration at the Plan Strategy stage.

Review required - do not believe that the Northern Area Plan 2016 has a remaining potential capacity of approximately 13,000 extra housing units. There will be various reasons why at an individual settlement level the identified capacity is unrealistic, undeliverable or constrained by access, infrastructure, environmental or other factors. Additionally, the estimated build rates provided will also require scrutiny, so that they are reflective of the changes in economic circumstances that have prevailed over the last 15 years or so. Welcome paragraph 6.52 of the POP and paragraph 4.4 of the POP Discussion Paper 12: Housing;

- Also a need for second homes in the area, and the contribution that second homes owners make of local shops and services and the significant levels of place attachment and local networks of family and friends in the area, the LDP needs to ensure provision for second homes is accounted for. Has a bearing on housing growth, as such owners are mostly from outside the Borough. Portstewart is one such affected settlement, and would benefit from additional provision for housing for both local and second home provision;
- Query how the plan period HGI pro rata has been calculated, how the timescales of the NAP and the new LDP relate to each other, and that there appears to be no discounting in the HGI from 2012-16, or relating to houses already built in this period. If the new plan period is 12 years, and the assumed annual build rate of 515 units is used, as in Table 8, the LDP HGI figure should be 6,180 units not 9,270 units. Requests that all the figures for the available housing zonings, committed development, windfall sites, villages and small settlements and for the countryside etc. is set out with common timeframes/scales for all data. Housing in the countryside, based on the information presented in the POP, could represent over 50% of the HGI figure which is not a sustainable approach to housing growth and distribution. There is the potential to deliver a significant housing uplift which is most concerning. An overprovision of existing zoned land should not, in itself, be justification for an increase in the HGI figures. The LDP should allow for clear and transparent HGI calculations based on the plan period, alongside the application of the Housing Land Evaluation Framework to ensure that all zonings meet the council's legislative requirement of furthering sustainable development. The LDP should adopt a plan, monitor and manage approach, with annual monitoring to determine the need for the release of a second phase of sites to maintain a 5 year land supply, which would be consistent with RG8 of the RDS. Recognise the need for more housing, but there is a profound tension between delivering ever-increasing amounts of housing and safeguarding finite environmental capacity. Crucially important that new housing does not compromise environmental integrity. If not carefully checked, the LDP could burden the environment with more housing land than is required;
- Acknowledge the Council's preferred option HS3 to review the principle of the existing policy framework. This option would allow the distribution of new housing to reflect better the RDS and allow the issue of dwellings in the countryside to be assessed, taking into consideration matters such as designated landscapes and the impact of single dwellings in the countryside against sustainable development principles. Whilst accept that Glenkeen, as a small settlement, is not the preferred location for future residential development, would encourage the Council to ensure that adequate land is zoned

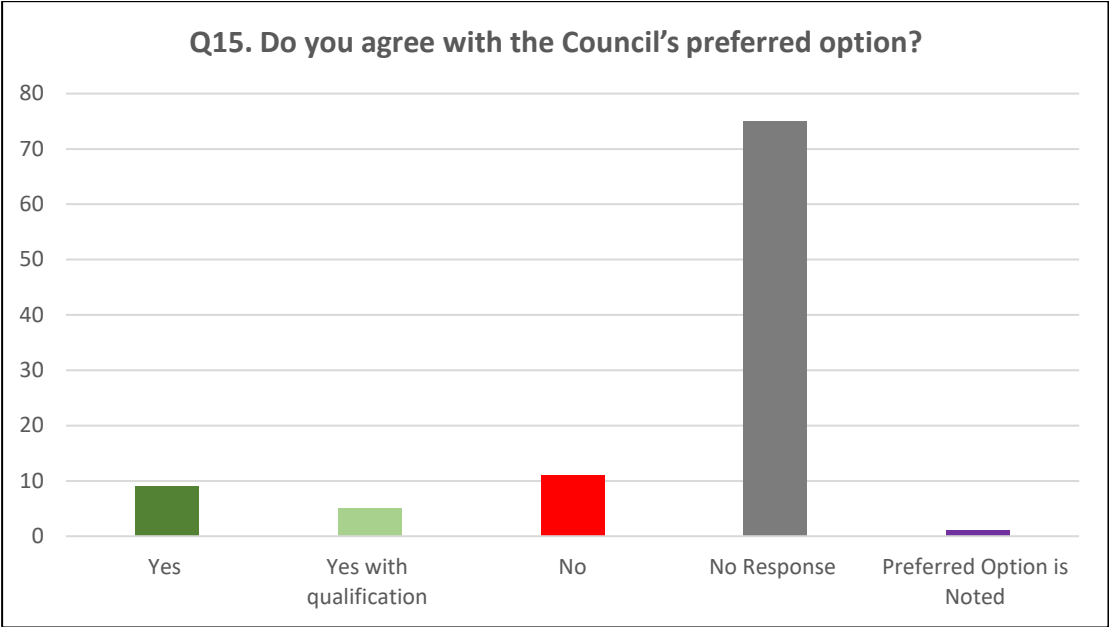
within the settlement limit to allow for mixed use and community development that would benefit and help sustain the wider rural community in the future;

- The key objective in the distribution of new housing should be sustainable growth and the approach should not be unduly constrained by hub designation;
- The Council's own figures show 30.9% of the borough's population live in the countryside (compared to 37.2% in the hubs). There are historic and cultural reasons for this and the comparable build rates show that this trend is continuing. Provision to be made for opportunities for rural living which can revitalise and sustain rural communities, and support rural infrastructure e.g schools, shops and transport links;
- There is obviously a desire for the borough's population to remain within the countryside; almost 31% reside there. Appropriate edge of town locations could also help to attract rural dwellers to the town settlements while still providing a degree of rural life and a mix of housing allocation out with the compact urban form. Towns may prove more attractive than the main hubs and this should be supported accordingly. Innovative design for edge of town developments could reduce the close parallel between main hub and countryside population percentages bringing the new LDP into general conformity with the RDS;
- The development limits of more rural villages should be extended to ensure rural locations can absorb and consolidate the additional housing required - this is not at odds with the intentions of sustainable development as it enables clustering of development, extending existing infrastructure provisions and sense of belonging. Feeny is located in a remote location when considered against the distance to the nearest towns and yet it provides the majority of everyday needs required for most households;
- Smaller settlements which provide more of a sense of place and belonging could facilitate housing in a sustainable manner to satisfy this desire. Many of the smaller settlements, such as Dernaflaw, have sufficient services, infrastructure and amenities to support a steadily growing population whilst upholding the sense of belonging and community that many of the population want. Small settlements have the potential to accommodate additional housing for people who want to remain part of a rural community whilst still ensuring sustainable development and the other overarching strategic principles are met. A way of facilitating rural dwellers' desires, further to rural policy, is to extend small settlement limits in a sympathetic manner to ensure rural locations can absorb the additional housing required over the plan period; this is not at odds with the intentions of sustainable development as it enables clustering and rounding off, extending existing infrastructure provisions and sense of belonging;
- Towns can prove more attractive than the hubs as demonstrated through local estate agents and developers.

4.3.2 Housing

Key Issue: HS1: Social Housing Distribution

Preferred Option (Amalgamation of Options 2 & 3): Distribute as per the focus of development in the hubs and based on the basis of settlement’s population.



Summary of Dfl’s Response:

- Support the Councils acknowledgement of the requirement to meet affordable housing need in a way that supports the aims and objectives of the RDS and SPPS, especially in relation to focusing housing growth in Hubs and Clusters of Hubs. Council should acknowledge there may be other material considerations indicating that affordable housing need ought to be met at or close to where NIHE indicate in the HNA. Liaison with the NIHE will assist in this regard.
- Care should be exercised in expressing the social housing need identified by the HNA as a percentage of the HGI allocation to individual settlements. Council is reminded that LDP policies and allocations should be realistic and appropriate. Accordingly, Council should liaise with NIHE to understand the position in relation to the funding available to meet the affordable housing need indicated in Table 14.
- Water & Drainage Policy Division: The provision of sustainable residential development will depend on the availability of water and sewerage infrastructure to support it. The availability of these services should therefore be a key consideration when zoning land for social housing.
- Regional Planning & Policy Team: Perhaps more pressure on transport and infrastructure if some provision made for housing in towns and villages in accordance with population distribution. However the Council believe it necessary in order to facilitate this type of housing development. This approach appears to be reasonable,

provided that Council are satisfied that their evidence justifies this - further details will be helpful in order to fully determine if this is a sustainable proposal.

Summary of Other Responses:

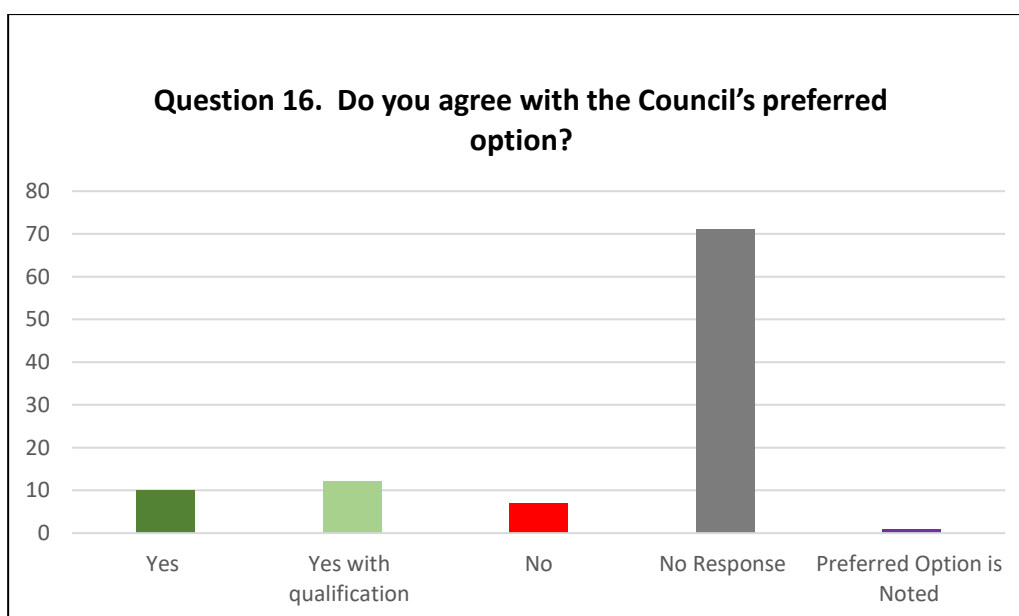
- Preferred option appears logical with further consultation with NIHE. This had not been identified as an issue in Mid & East Antrim where 77% of the social housing need was within the main towns, 18% within small towns and 5% within villages;
- As with the overall distribution of housing, ancient and long-established woodlands need to be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;
- Note the preferred option to distribute social housing across the Borough's hubs and other settlements proportionately, and to zone lands specifically for social housing;
- Flexibility is sensible here and Community need as in allowing families access, is an important consideration. On what basis are the decisions to build Social Housing made?
- Social housing Policy HS1 and HS2 - option 1 for both would be more appropriate and responsive. Greysteel is within 9km and is proximate to the city of Derry-Londonderry and within its catchment where recent social housing lists reveal 4,360 households in the Council area waiting list. The village has close physical and other ties with the city and must recognise social housing demand from the City as part of its catchment and adjust its housing projections and allow additional zoned lands for same. NIHE housing needs should also include the nearby City and lands allocated accordingly;
- Query need for policy - social housing location is largely dictated by NIHE data on basis of need (Housing Needs Assessment). Policy should not be discounted;
- Thresholds and mechanisms for delivering social and affordable housing are contained in HS 2;
- Opportunity for policy consideration aimed at the potential of re-using vacant or underused historic assets, pending appropriate policies to ensure a heritage asset and its settings are protected, conserved and enhanced. Such a policy would provide a sense of local identity and consolidate a community relationship within a place. Policy wording needs to be considered not to impact negatively existing policies relating to changes affecting historic assets or their setting. In relation to scoring, the potential position impacts on historic landscape character and historic environment (option 2); previously unidentified below ground remains and other heritage assets, require fuller consideration and an uncertain score would be more appropriate. Please also see our comments relating to HS1 within the Interim Report sub-heading of this questionnaire;
- Social housing should be identified as a key site requirement on appropriate zoned site in main hubs. Beyond this, provision should not be specifically required unless coherent regional policy is developed. The plan's housing allocation should allow for continuity of supply beyond plan period i.e. to ensure that as the plan nears its end date, housing land reserves do not dry up pending new plan or plan review;

- Do not believe the issues of social housing and 'evening economy' are necessarily connected. In many of our locations, evening economy will be enjoyed by others and not particularly by the social housing sector. This needs to be qualified;
- Focusing social housing growth in the hubs, is in line with the RDS;
- Agree with the preferred option as, although focusing social housing growth in the hubs is in line with the RDS, this option will also allow some provision in towns and villages to help support facilities and services and maintain local social cohesion. Note the requirement of social housing need for Portstewart, which is unlikely to diminish over the LDP lifetime and, hence, housing distribution to Portstewart will need to be increased to allow for this need;
- Welcome the recognition (POP section 6.61) that the allocation for Portrush will be particularly stressed by the level of social housing need compared to the allocation of housing land. However, the LDP must make adequate provision for housing development of the social, private and mixed-tenure varieties. Future settlement limits and zonings should not be drawn so tightly that there is no flexibility in housing delivery.

4.3.3 Housing

Key Issue HS2: Provision of Social and Affordable Housing

Preferred Option (Option 3): Amend existing policies with regard to thresholds for the provision of social housing and develop policy relating to affordable housing.



Summary of DfI's Response:

- Unclear whether the Council has considered the need to assess the impact of any revision on the viability of development. Welcome the chosen approach and the evidence presented in relation to the profile of applications received. It is noted that in

addition to a site threshold policy, the NAP also adopts a Key Site Requirement (KSR) approach specifying numbers of affordable units to be provided on each Housing Zoning. If the council proposes to maintain a KSR approach, this is not immediately obvious from the text attached to the preferred option. The Council is reminded that 'Affordable' housing includes social rented housing and intermediate housing for eligible households.

- Regional Planning & Policy Team: Council propose a revised approach to social housing provision. The option outlined in HS2 would allow for the thresholds contained in the Northern Area Plan and PPS 21 to be reassessed to determine if they are still relevant. This appears to be reasonable, given the local situation, however more clarity (including proposed figures) would be helpful in establishing how this would be implemented.

Summary of Other Responses:

- Land needs to be specifically spatially zoned and erosion of the green belts and other protected areas prevented. The figures quoted in Table 13 would appear to be totally out-of-date and therefore invalid. Castlerock and Portballintrae have clearly suffered a further loss of permanent residents in recent years. There are already too many second homes and this trend is accelerating;
- As with the overall distribution of housing, ancient and long-established woodlands need to be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;
- Note the preferred option to distribute social housing across the Borough's hubs and other settlements proportionately, and to zone lands specifically for social housing;
- As an affordable housing provider, always found that its provision and availability are most heavily influenced by the availability of zoned lands to develop, the willingness of land owners to develop those lands and the state of the market in terms of deciding what is affordable at any one time and creating a demand for that affordable housing;
- For social housing Policy HS1 and HS2 - option 1 for both would be more appropriate and responsive. Also, the village of Greysteel is within 9km and is proximate to the city of Derry/Londonderry and within its catchment where recent social housing lists reveal 4,360 households in the Council area waiting list. The village has close physical and other ties with the city and must recognise social housing demand from the City as part of its catchment and adjust its housing projects and allow additional zoned lands for same. NIHE housing needs should also include the nearby City and lands allocated accordingly;
- The council is proposing that the thresholds be re-examined given the high level of unmet social need. Any proposed changes to the thresholds need to be supported by an appropriate evidence base. Support and welcome this position and suggest that social housing needs to be considered as an element of the overall housing allocation for the Borough than a separate or discrete matter;

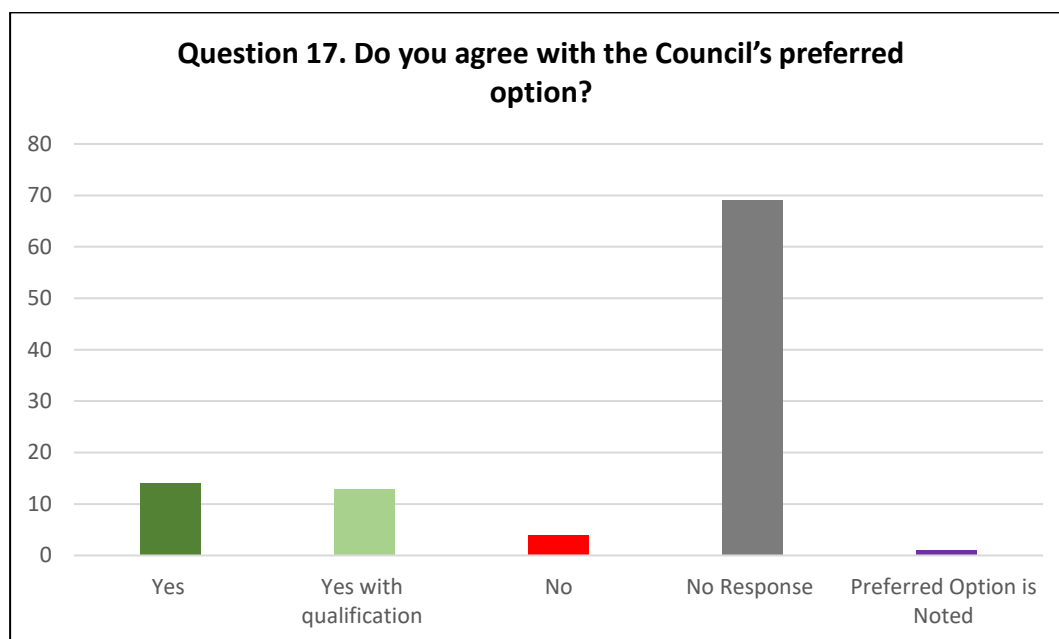
- As per the SPPS, it is important to recognise the variations in environmental characteristics (including historic environment characteristics) and to be sensitive to the ability of settlements and landscapes to absorb development;
- Accommodation for families - 3 and 4 bed homes - is lacking. Without families the primary schools will fail (one is already undersubscribed) and fewer families will want to live here. Accommodation for 1 and 2 person homes is also lacking. Older people, single people, those who want a two bed bungalow or accessible flat are underserved. At present such people must leave their social and support circle and move out of the village. This leaves them more vulnerable in any new location where they do not have friends or family and more socially isolated, with all its resulting health and support problems. More small, accessible accommodation would free up some larger homes for families. Such accommodation would also allow those with care needs to stay longer in their own homes with some support, reducing the strain on public services;
- Prefer Option 1;
- Social housing policies and delivery should be a regional matter, with proper consideration given to matters such as viability etc;
- Earlier comments regarding over-provision of housing land apply and are extremely relevant in this regard. An excess of housing land should be allocated to ensure that development land prices stay reasonably low, and so that social housing can actually be economically developed. If housing land is tightly constrained, then social housing becomes virtually impossible. Definite need to incorporate social/affordable into the broad mix of housing developments and should learn from the many other UK areas that are well ahead of us in this regard. Don't need to re-invent the wheel, look to existing exemplars and adopt similar quickly;
- Welcome the intention to develop a policy relating to affordable housing. However, the existing policy framework for social housing is not performing well. NAP Policy HOU 2 for the provision of social and supported housing is based on a site threshold of more than 25 units or a site area of 1 hectare or more, where an established need for such housing has been demonstrated via a Housing Needs Assessment (HNA). This has resulted in the pursuit of residential schemes below these threshold triggers to avoid such provision being required. That is evident from the Table 15, page 15 of the POP. PPS 21, Policy CTY 5 also makes provision of social and affordable housing adjacent to or near small settlements, which it defines as having a population of around 2,250 or less. It has also not proved successful, as for example, the sequential site tests (a)-(c) element proving unwieldy. The second option presented in the POP is to zone land specifically for these types of housing. The third option proposed is to amend existing policies regarding thresholds for the provision of social housing and develop policy relating to affordable housing. Existing social housing policies are failing, with new policy regarding affordable housing welcomed. However, in terms of the justification, it may be appropriate, in certain circumstances, to also specifically identify and zone land for these purposes (i.e. option 2), especially in areas where there is already an identified need;
- Social housing could form part of a settlements' overall housing allocation and zoning rather than in addition to it. It should form an integral part of housing schemes and

proportionate to population and settlement size as informed by the various government agencies.

4.3.4 Housing

Key Issue HS4: Private Amenity space in New Residential Development

Preferred Option (Option 2): Revise existing standards to provide minimum space per unit in both urban and rural residential development.



Summary of Dfl's Response:

- Whilst the SPPS acknowledges the importance of adequate private, semi-private and public amenity space, Dfl requests clarification that the preferred approach of establishing a minimum level of amenity space provision per unit will not undermine other planning policy objectives, in particular those of the RDS and SPPS in promoting more compact urban forms and higher density housing in town and city centres and other locations that benefit from greater accessibility to public transport. The Council should ensure that the approach is sufficiently flexible and will allow for consideration of the local context in determining the appropriate density/plot size ratios of new residential developments.
- The SPPS and Creating Places encourage the use of LDPs to specify density levels appropriate to the location of the site, the character of the surrounding area and accessibility to public transport links. Further evidence and consideration by the Council of the need for a minimum amenity standard for housing in the countryside would also be welcomed.
- Regional Planning & Policy Team: Council propose to deviate from the open space requirements contained within Creating Places. This would involve reassessing the current standards and seeing if they are still applicable – this has been justified to some

extent. It would have been beneficial for the Council to have been more specific on their proposed requirements.

- It is noted that this is an issue for the Council locally and this option would allow the existing standards to be reassessed to determine if they are still suitable, for example if there is sufficient space for the storage of additional bins, sheds and usable private space for residents' varying needs.
- Consider further when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

- Landowners should be forced to build homes – e.g two areas on Dungiven lower Main Street;
- Should be minimum size and space, to rooms inside properties and to outside areas. New build houses and apartments frequently have tiny rooms and no storage space, thus rendering them totally impractical except as holiday homes for short-term occupation. Space must be made mandatory for the storage of waste bins and other such amenities;
- This was not considered an issue in Mid & East Antrim;
- Broadly supportive of preferred option. Highlight the need to ensure best possible outcomes from the provision of this private amenity space, such as requiring green infrastructure such as tree/hedge planting, grassy areas, soft SUDS infrastructure etc. to ensure minimum negative impacts, particularly on sustainability objectives 10, 11 & 12. It is important that the benefits of these assets are properly recognised by developers and statutory agencies;
- Urge the Council to ensure local developers and other stakeholders are involved in the review;
- Welcome the direction taken in the preferred option. However, such an approach must be clearly defined to ensure the desire to achieve appropriate amenity does not directly compromise heritage assets or their settings. Any policy preference must be in line with the SPPS strategic objectives towards archaeology and built heritage, e.g. in the context of creating inappropriate sub-division of the setting of heritage assets for housing schemes;
- Consideration could be given to car parking space, particularly in relation to HMOs where a house with 6 students could have 6 cars but only space for 2;
- Apartment blocks and second homes are usually lacking in gardens. The standard landscaping seems to be paving for parking plus areas of gravel or stone with an occasional shrub. This gives an arid, bleak aspect to the streetscape and removes some of the attractiveness of the village streets. This cannot be legislated for easily but is another point to be borne in mind in considering applications for planning permission;
- Support either Option 2 or Option 3. Essential that homes have sufficient space for families;
- Existing policies and guidance in PPS7, PPS8 and Creating Places are adequate. No need to develop Borough specific policies. Prescriptive policies for amenity space etc. could reduce housing densities and prejudice viability of some development proposals. It

could also reduce consumer choice and affordability. Development management process is capable of ensuring delivery of quality development;

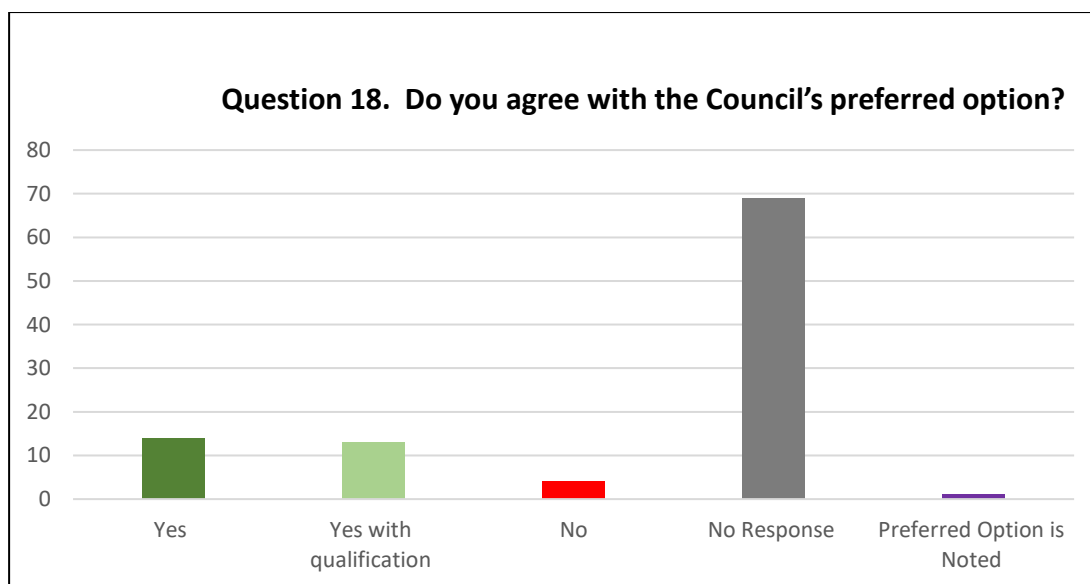
- No logical basis to impose more restrictive policies in relation to amenity space in Borough. Such controls would prejudice affordability, choice, sustainable use of land etc. Each proposal should be assessed on basis of current guidance (e.g. Creating Places) or in individual design;
- Response to these issues has been too slow and inconsistent. Regularly raised issues of contrast between one scheme approval and another, and these inconsistencies should be ironed out. Repeat comment that excellence should be pursued and not mediocrity or average. Assert that housing standards should be used and many 'Codes' available. Recommend the Code for Sustainable Homes until such times as a better emerges. No benefit in re-inventing the wheel;
- The preferred option would allow reassessment of the Creating Places guidance to determine if they are still suitable, for example, if there is enough space for the storage of additional bins, sheds and usable private space for residents' varying needs. Whilst a review is welcomed, most developers are acutely aware of the need to ensure such provision in their schemes, as the astute purchaser of new build dwellings is now much more aware of such matters when considering their purchase, with such provision already being adequately provided. No need to apply to housing in the countryside. It would be extremely rare to have dwelling proposed in the countryside without such adequate provision, as the curtilage of it is defined by its red line boundary, within which there is nearly always ample room for such provision. Agree with the intention for the existing policy for onsite public amenity space to remain unaltered;
- No objection to the principle of increased public amenity space per unit, but the preferred option makes no reference to the requirement for public amenity space and this should be clarified;
- Housing development in the borough is typically small scale and not large enough to trigger the need for public amenity space at 10% of the site area. It should be considered whether developments less than 50 units require on-site public open space, as very small areas of public open space within small developments are often poorly located and designed. These areas can be difficult to manage and unusable for any meaningful recreational activity, leaving them vulnerable to neglect and anti-social behaviour. Ultimately there may be a compelling argument for open space to be built on to remove these problems. Where there are no natural or heritage features that would create an obvious focus for open space, it may be preferable to concentrate resources on larger scale public amenity areas (or urban realm improvements) that are more accessible to larger numbers of people. Developer contributions may be a means of delivering off-site open space in lieu of land within a scheme. Some developments less than the current threshold of 25 units will still require more than 10% of the site to be set-aside to provide spaces for existing trees, water, archaeological features or natural habitats. In such cases, density of development could be increased and minimum garden sizes may reasonably be reduced, without loss of overall amenity;
- Acknowledge that private amenity space is a vital part of the overall planning unit and should not be compromised. However this should also be reflective of the built form and the urban location of development proposals. Appropriate amenity space will also

reduce over development and compact units while adding to biodiversity and visual amenity. However, this should not be so restrictive and allow for variation depending on the surrounding amenities (e.g. access to public open space, walkways, waterways etc.), residential character and other provisions that may be incorporated into the scheme i.e. public open amenity space. The existing natural habitats attached to the site will enhance private amenity values and form natural key design features for future development.

4.3.5 Open Space, Sport and Outdoor Recreation

Key Issue: OS1: Provision of Open Space

Preferred Option (Option 2): Review the existing threshold by which new developments should make provision for public open space.



Summary of DfI's Response:

- Objectives are not always clear regarding the protection of existing open space in any of the options generated.
- Council is reminded that the SPPS stipulates that there should be adequate provision for well-designed open space as an integral part of the development. The Council should ensure that any departure to regional and strategic policy direction is founded on a robust evidence base.
- Any approach which seeks to introduce increased provision or a smaller threshold which is tailored to specific circumstances is welcomed. Any review, however should align with strategic policy. Council is reminded that if the outcome of the review results in the loss of open space, then any exception to this general approach should only be permitted where it is demonstrated that redevelopment would bring about substantial community benefit that outweighs the loss of the open space; or where it is demonstrated that the loss of open space will have no significant detrimental impact. Council is also reminded

of the need to be consistent and to this end, the Council should consider any overlaps between the approach for open space and the preferred option under key issue DC1.

- Regional Planning & Policy Team: The principle of the preferred option for Key Issue OS1: Provision of Open Space is noted and welcomed by PPD.

Summary of Other Responses:

- At present Mid & East Antrim intend to retain regional requirements;
- Sensitive and vulnerable habitats must be protected from degradation/destruction through increased use. Option 2 could increase its positive outcomes if the Council committed to creating open/green space for amenity. Green infrastructure must be fully protected in the development of or integrated in to the creation of this open space to ensure full benefits to people, wildlife, biodiversity and ecosystem services are enjoyed. If open space is provided off-site, it is vital that safe, multi-able access paths are required to allow full access for all members of the local community;
- Support the protection of open space (including open space of biodiversity value) and suggest that in identifying and evaluating current open space provision in the Borough that the Natural Capital Accounting Methods is applied (separate documents for NI). LDP should require new residential development of an appropriate scale (generally 25 or more units, or on sites of one hectare and above) to provide adequate and well-designed open space as an integral part of the development in accordance with paragraph 6.206 of the SPPS. Bearing in mind the SPPS requirement, we support the proposal to review the existing open space threshold in general if it results in the creation of more public 'useable' urban spaces which are designed as an integral part of a development and suitable for everyone to access and enjoy. In compliance with paragraph 6.210 of the SPPS, the plan should designate areas of open space including those that perform a strategic function; public access to and along the coast; and sympathetically designed linear spaces for walkers and cyclists. Plan should also protect the open nature around certain listed buildings, historic parks, Conservation Areas (e.g. Cushendun) and our only WHS Giant's Causeway to ensure critical viewpoints are protected and the broader setting respected. The plan should also protect critical viewpoints in and out of Cushendun Conservation Area. Policy should also be included that requires development proposals with public open space that such spaces are in keeping with environmental principles and sustain and enhance biodiversity;
- An overarching principle of the Sustainable Development Strategy (SDS) 2010 is 'to ensure a strong, healthy, just and equal society'. It also identifies that recreation and sport have a role to play in ensuring a strong society through promoting and improving the health and wellbeing of the population and improving the quality of life through experiencing and participating in and accessing cultural and sporting pursuits'. The RDS states that 'Improved health and wellbeing is in part derived from easy access to appropriate services and facilities'. While there is support for many aspects of the document there are a number of suggestions for improvement in respect of how disability access can be improved with better link through between SPPS direction and Plan Objectives; Requirement for disability access for all Land Uses; Acknowledge of the role played by the Third Sector in open space and community provision; and intention of

Foundation to contribute towards the Borough shortfall in provision through work currently under development with Council including proposals to turn the Bann Water sports Centre into a more inclusive environment for disabled users and the introduction of an inclusive triathlon at Parklands. Agree with the objective but it lacks consideration of the introduction of the requirement that new open space should be accessible for disabled users for example through specific equipment for wheel chair users.

Disappointing that there is no link through of the previously noted SPPS objectives relating to accessibility in either the plan vision or objectives relating to recreation and leisure. The current translation is insufficient to cover either the SDS linkage to improving health or the SPPS focus on accessibility for children, older people and those with disabilities and we would ask that the policies when drafted in the Plan Strategy ensure a stronger focus on the need for accessibility for all in open space, leisure, recreation or community provision. A contribution towards improving disabled access to existing open space should be considered within the scope of offsite contributions and any new provision should comply with best practice;

- Urge the council to ensure local developers and other stakeholders are involved in the review;
- The council is advocating a revised policy that would depart from the normal policy requirement of 10% open space in schemes of 25 units or more. It is appreciated that the delivery of open space is an important element in residential development, suggest any new policy needs to be supported by qualitative and quantitative evidence. The conditions for when the use of developer contributions to offset any payments also needs to be clearly prescribed;
- Welcome the direction taken in the preferred option. Advocate promotion of historic assets, such as State Care Monuments, settings of listed buildings, historic parks, gardens and demesnes, as key opportunity areas for promoting and protecting open space around and within new developments. Particularly important in the Plan Strategy to highlight statutory designations within recreation sites, and to protect historic environment interests through appropriate key site requirements. Open space in the heritage asset context is not only linked to country estates, but also includes historic parks, gardens and demesnes. Underused and often publically owned open spaces around heritage assets; such as historic graveyards, historic route ways, waterways/canals or abandoned railway lines, and suggest that the LDP offers an opportunity to capture the potential of accessing these as distinct, peaceful places for the enjoyment and benefit of the local community. Historic environment forms an important role in defining open space within the Borough. Must demonstrate how the historic environment has been considered in relation to any future zonings, and how, where appropriate, it has informed mitigation strategies such as appropriate designation or relevant key site requirements (e.g. for identification of archaeological remains and mitigation of impacts). Where archaeological remains are encountered and preserved as open space within developments, provisions should be made toward their understanding and interpretation, so that their full contribution to community identity and pride can be realised. Attractive open spaces against heritage backdrops can provide a better opportunity to realise tourism potential and promote distinctiveness. Work with bordering councils to make the most of any shared historic environment

recreation attractions (e.g. canal towpath routes or disused railway infrastructure for Greenways). Highlight importance for the compilation of associated conservation management plans, to inform and guide any future change and to ensure heritage-led regeneration with a consistent approach, so that the historic integrity of any heritage asset is not compromised. Unable to provide further comment at this time without review of potential areas to be zoned. Ensure maps are included at Plan Strategy stage for review/consideration. Highlight the importance of utilising these spaces to promote education, health, civic pride and community cohesion.

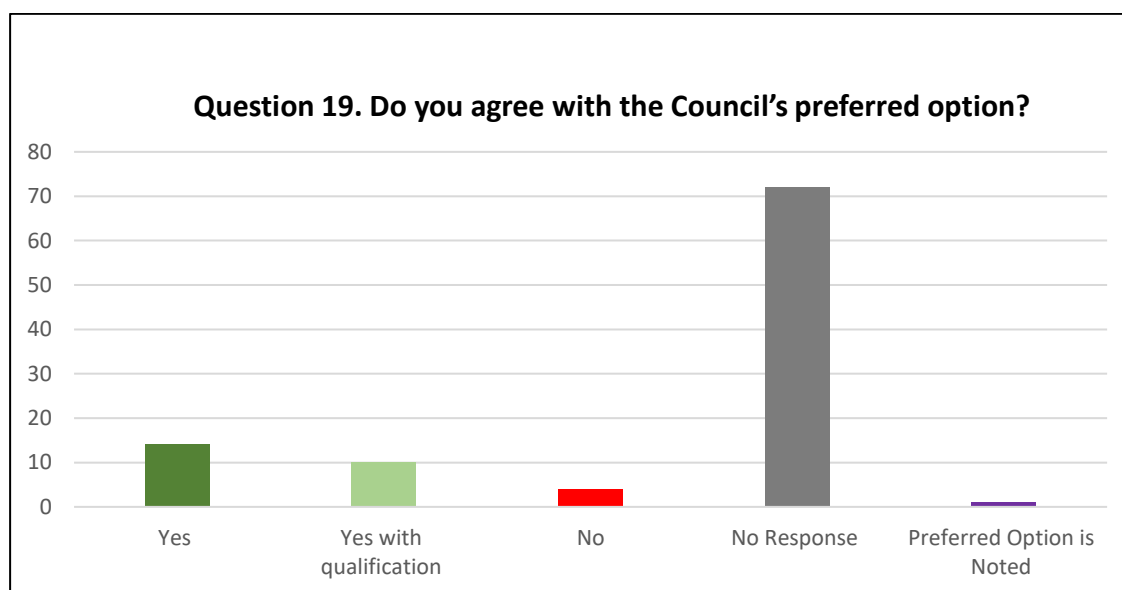
- Important that standards are equally applied. Council should be careful to make sure that measures put in place do not deter larger developers from developing locally;
- Agree with Council's Preferred Option 2 that would undertake a review of the existing threshold by which new developments should make provision for public open space. This option would allow the Council to determine a more appropriate threshold, relevant to the Borough, to which open space provision would apply rather than that set out in the SPPS;
- Presently, such provision is required for 25 units or more, with a considerable number of residential developments sought and built with less than that, thereby not requiring any such provision. This leads to an overall lack in the settlements concerned and places a burden on the already low levels of existing provision. Moreover, it also allows for the investigation for off-site contributions, appropriate to the scale of development proposed, instead of onsite provision. This investigation should also consider not only contributions, but alternative public open space provision elsewhere, as a possible other alternative;
- No objection to a review in principle provided this does not result in a downward requirement. Further clarity is required as to when off-site contributions may be considered, and must not result in overdevelopment of the site or contribute to an increased number and length of car journeys to visit off-site facilities as this would not contribute to furthering sustainable development. Developers should be required to submit a detailed landscape strategy to demonstrate how open space provision is adequate, well-designed and integrated, with future management and maintenance. A requirement to support wildlife should be included given its benefits. Regard should be had to the aging population in the accessibility and design of open space, see Wellbeing through Wildlife. It is not just the quantity of open spaces which is important, but the quality of and accessibility to are equally important. Also, the importance of a site for biodiversity is not always linked to how good it looks or how green it is. Any loss of greenspace to development cannot be regarded as off-setting greenfield land requirements elsewhere, as it is still greenfield land and its loss must be regarded as such. Any proposed loss must be consistent with the restricting provisions of PPS 8 and there must be no detrimental impact on biodiversity or on sensitive environmental areas and features;
- With reference to the Sustainability Appraisal Matrices, the following comments are made: Key Issues OS1 & OS2 Against sustainability Objective 12, notwithstanding the potential positives, there is also the potential for a negative impact on biodiversity as the 'Open Space' policy does allow for hard surface recreational areas and 'improved' playing fields. Thus it depends on what was on site prior to open space development;

- Broadly agree. One reason few large areas of open space have been delivered is the lack of larger housing zonings in the borough. These larger developments will generally have significant public open space allowed for at the master planning stage. For smaller-scale schemes and windfall sites (which are more common) contributions and connectivity to projects such as greenways could be more appropriate;
- No objection to this key issue as this will also provide a quality residential/work environment and sense of place. Appropriate management schemes should be required for new proposals demonstrating how these will be managed and monitored.

4.3.6 Open Space, Sport and Outdoor Recreation

Key Issue: OS2: Maintenance Arrangements for New Open Space

Preferred Option (Option 2): Review the existing maintenance arrangements to identify alternative arrangements.



Summary of DfI's Response:

- Encouraging to see preferred option seeks to review existing maintenance arrangements and identify new arrangements.
- In order to ensure that a suitable mechanism is in place to secure the future management and maintenance of open space in new residential developments, the Council should ensure that preferred options for key issues OS1 and OS2 complement each other. Whilst there is merit in principle for this key issue, the mechanism of how this will be achieved is unclear.
- Regional Planning & Policy Team: principle for preferred option is noted. Although there is merit in this principle, the extent and mechanism of how this will be achieved is unclear.

Summary of Other Responses:

- Maintenance arrangements for open space must respect, and enhance the current and potential biodiversity and ecosystem services value of that space for environmental benefits, using native and local provenance trees for planting to increase resilience and decrease risks associated with tree disease and pests;
- Ensure local developers and other stakeholders are involved in the review;
- Welcome the direction taken in the preferred option. Advocate promotion of historic assets, such as State Care Monuments, settings of listed buildings, historic parks, gardens and demesnes, as key opportunity areas for promoting and protecting open space around and within new developments. Particularly important in the planning strategy to highlight statutory designations within recreation sites, and to protect historic environment interests through appropriate key site requirements. Open space in the heritage asset context is not only linked to country estates, but also includes historic parks, gardens and demesnes. There are a number of existing underused and often publically owned open spaces around heritage assets; such as historic graveyards, historic routeways, waterways/canals or abandoned railway lines, and suggest that the LDP offers an opportunity to capture the potential of accessing these as distinct, peaceful places for the enjoyment and benefit of the local community. Historic environment forms an important role in defining open space within the Borough. Will be important to be able to demonstrate how the historic environment has been considered in relation to any future zonings, and how, where appropriate, it has informed mitigation strategies such as appropriate designation or relevant key site requirements (e.g. for identification of archaeological remains and mitigation of impacts). Where archaeological remains are encountered and preserved as open space within developments, provisions should be made toward their understanding and interpretation, so that their full contribution to community identity and pride can be realised. The creation of attractive open spaces against heritage backdrops can provide a better opportunity to realise tourism potential and promote distinctiveness. Highlight importance of working with bordering councils to make the most of any shared historic environment recreation attractions (e.g. canal towpath routes or disused railway infrastructure for Greenways). Highlight importance for the compilation of associated conservation management plans, to inform and guide any future change and to ensure heritage-led regeneration with a consistent approach, so that the historic integrity of any heritage asset is not compromised. Unable to provide further comment at this time without review of potential areas to be zoned. Therefore, it is important to ensure that maps are included at Plan Strategy stage for review/consideration. Highlight the importance of utilising these spaces to promote education, health, civic pride and community cohesion;
- Provision of open space should be tie into existing accessible routes;
- Essential that alternative arrangements are considered as current maintenance arrangements are not working;
- Ridiculous with all the emphasis of 'Creating Places' that local councils were unable to control these spaces, and they have largely become meaningless areas of grass rather

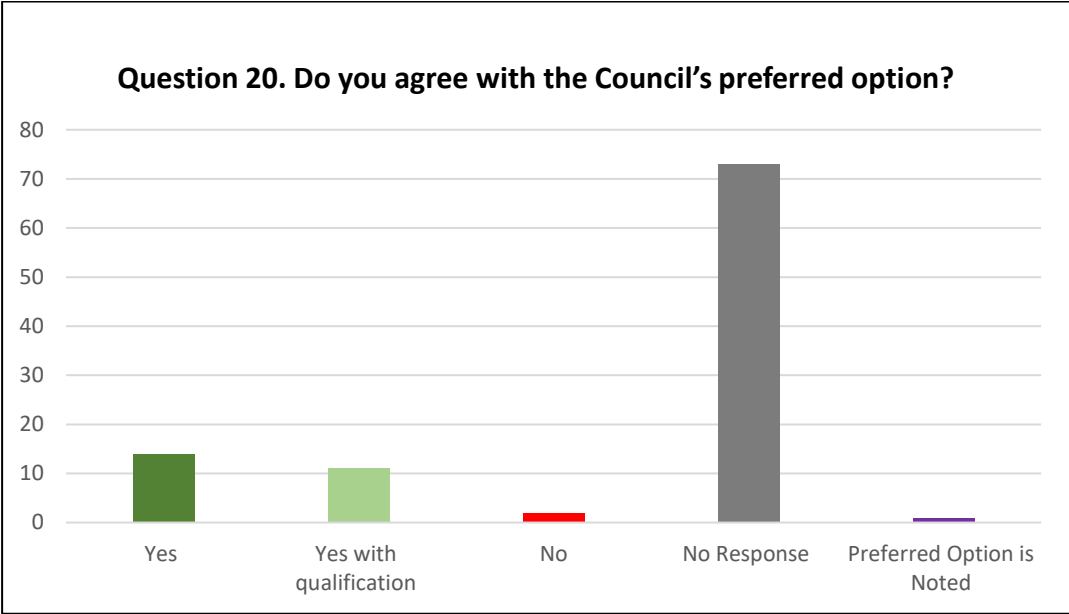
than creative community spaces. Reasonable argument that already formed spaces should be improved - perhaps with a constructive local community scheme?

- As the POP acknowledges, the problems associated with lack of maintenance, failure to adhere to the management agreement and the management company no longer operating are some of the factors that have had a negative impact on public open space areas in residential schemes;
- The preferred option would allow alternative arrangements to be considered, drawing from recent experience on completed housing sites, and the Council's role in maintaining its own open spaces;
- Do not agree that small areas of public open space have limited visual and practical value for residents, no matter how small, they can provide value for residents and wildlife, and can act as important stepping stones or connectors to other areas of open space, thereby allowing the movement of wildlife within an urban context, which is vitally important given the declines in urban wildlife. Would resist the loss of open spaces in urban areas - just because it is currently underused or difficult to manage is not a justification in itself for its loss. A new community approach to the management, ownership, connectivity and increased accessibility could serve in part to re-enabling these open spaces to make a positive contribution to the local area and biodiversity. Given the importance of green open spaces, any new approach to their management should not result in the demise of their requirement or a reduction in same;
- With reference to the Sustainability Appraisal Matrices, the following comments are made: Key Issues OS1 & OS2 Against sustainability Objective 12, notwithstanding the potential positives, there is also the potential for a negative impact on biodiversity as the 'Open Space' policy does allow for hard surface recreational areas and 'improved' playing fields. Thus it depends on what was on site prior to open space development;
- Appropriate management schemes should be required for new proposals - demonstrating how these will be managed and monitored.

4.3.7 Open Space, Sport and Outdoor Recreation

Key Issue OS3: Provision of Green and Blue Infrastructure

Preferred Option (Option 2): Provide policy to facilitate proposed green and blue infrastructure in the Borough.



Summary of Dfl's Response:

- Welcome the preferred option to provide policy to facilitate green and blue infrastructure in the Borough. It would utilise the Borough's natural assets to provide open space and recreation opportunities for residents and tourists with subsequent spin off benefits relating to health, well-being and economic development. While full details are unknown at this stage, the selected approach appears to align with strategic policy direction. In the absence of further detail however, it is difficult to fully comment.
- Water & Drainage Policy Division: Welcome the SPPS reference which states plans should contribute positively to health and well-being by facilitating the protection of green and blue infrastructure.
- Welcome the commitment to encourage blue green infrastructure within the POP. One of the ways to increase the use of this is by encouraging the use of SuDS in new developments or as part of town centre regeneration projects.
- Regional Planning & Policy Team: Principle of the preferred option is noted and welcomed.

Summary of Other Responses:

- Broadly support the preferred option. Green and blue infrastructure can bring many and varied benefits for people, the environment, wildlife, environmental resilience and climate change adaption, it must be approached, implemented and managed for all of these important outcomes. Recommend the integration of tree planting, woodland creation, connectivity planting - this can improve biodiversity, increase wildlife habitats,

provide shelter and shade, flood alleviation, improve air quality, improve water quality, protect vulnerable/important/sensitive habitats, provide shared space for recreational purposes, improve mental and physical health outcomes, promotes environmental stewardship. Appropriately designed and integrated green and blue infrastructure supports wider landscape resilience. Green and blue infrastructure integrated on the landscape scale will provide greater ecosystem services than smaller disconnected elements. The protection of important and sensitive habitats must be protected. It is important to reflect the Council's statutory duty to further the conservation of biodiversity. This infrastructure should complement any existing biodiversity value, not compete with or damage it;

- In accordance with paragraph 6.196 of the SPPS, we fully support the preferred option to take forward policy for the protection of the Council's green and blue infrastructure which should be identified in a comprehensive manner where it would add value to the provision, enhancement and connection of open space and habitats in and around settlements. Within both greenways and blueways, policy should be provided that stresses the importance of sympathetic design to minimise the impact on the natural environment and landscape. The plan should encourage developers in new housing development proposals and non-residential schemes to submit and agree design concepts that show landscaping integrated with broader green and blue infrastructure systems;
- There is a need to include disabled access within any new provision to create a more inclusive environment and to assist in meeting the tests of equality impact;
- The Council is responsible for town halls etc. yet the one in Portstewart has not been maintained, is not affordable therefore underused allowing the claim "there is no demand". Council has a moral responsibility to provide safe public space;
- Ensure local developers and other stakeholders are involved in the review;
- Commend the council for taking a pro-active approach to green and blue infrastructure;
- Welcome spatial connectivity, green and blue infrastructure (greenways etc.) and highlight canal towpaths, railway/tram lines etc. Any associated planning guidance should factor-in requirements for a heritage-led development approach to be adopted to safeguard the historic character and setting. Leading to positive outcomes for the historic environment and other objectives in relation to social, economic, natural environment and residents' health and wellbeing. Historic England has published "Wellbeing and the Historic Environment" - focus on the positive impact of the historic environment on the physical and mental wellbeing of a person and community, not just the economic model. Could form an additional element of evidence base (link provided). Recommend utilise HED suite of datasets to identify heritage assets, archaeology sites and listed buildings etc., where holistic greenways and blue infrastructure could be designated. Historic environment forms an important role in defining open space in the Borough. Important to include provisions to protect heritage assets which form part of linked open spaces historic routes and railways so their local heritage value and distinctiveness is captured. To achieve the positive outcome, highlight importance of identification/location of heritage assets to feed this information into the decision making process at plan strategy. Where heritage assets are entailed in the creation of a greenway it would be important to ensure that a

heritage-led approach is in place to protect and make the most of these in the process. Unable to provide further comment at this time without review of potential areas to be zoned;

- This would allow for steps to be taken to protect the remaining strips of land such as that on the landward side of the coastal path stretching from Port Na Happle to the Strand Head from development. It is important that all areas of open space that still remain along the coast are protected and remain open and attractive to the public for outdoor recreational pursuits;
- Castlerock beach attracts residents and visitors all year round. However, lacks facilities such as accessible toilet, outdoor showers for swimmers and surfers, changing space, shelter etc. Facilities in Portrush and Benone beaches - consider that many of these would be suitable/useful in Castlerock. The Council spent a considerable amount of money and time in writing Village Plans for over 20 of the villages in the Council area. Castlerock has a Village Plan, on which we and the residents expended considerable effort and time. Yet there is no mention of these in the Development Plan or any of the Discussion Papers as far as we can see. Does the Council consider these redundant or is it ignoring the findings and targets of the Castlerock Village Plan? Castlerock beach has great potential which is not being explored or developed. The Council must work with the village to develop this great outdoor asset;
- Welcome the preferred option. There is a need to promote and plan for the creation of networks of green and blue infrastructure and open spaces throughout all settlements within the Plan area, forming linkages of wildlife corridors, pedestrian routes and cycleways;
- The Bann River relationship through the centre of Coleraine must be examined urgently - opportunity to make the most of this for locals and visitors - rather than a lose it;
- Understand that 'Green infrastructure' includes parks, sport pitches and woods, and 'blue infrastructure' includes rivers and streams. Agree that there is: "...an opportunity to improve public enjoyment and access to our blue infrastructure". Moreover, agree that such access: "...needs to be balanced with the need to protect the natural environment". Therefore, as Council suggest, delivery of: "...appropriately sited and scaled development can assist in increasing the public's appreciation and use of our water";
- At present, green infrastructure is provided via PPS 8 and Creating Places, but there is no such 'blue infrastructure' requirements. Agree with option;
- Agree. There is no blue infrastructure policy requirement presently. There is an opportunity to improve public enjoyment and access to blue infrastructure. Such access needs to be balanced with the need to protect the natural environment, with appropriately sited and scaled development that can assist in increasing the public's appreciation and use of the Borough's water;
- This needs to go further than simply protecting the natural environment if it is to further sustainable development - enhancing should be included. It would be helpful if the POP listed the open spaces in the Borough. These areas are important for well-being and biodiversity alike. River corridors should also be protected to ensure there is no detrimental impact on biodiversity or on sensitive environmental areas and features. This should apply to all river corridors and not just to the main rivers, as biodiversity is

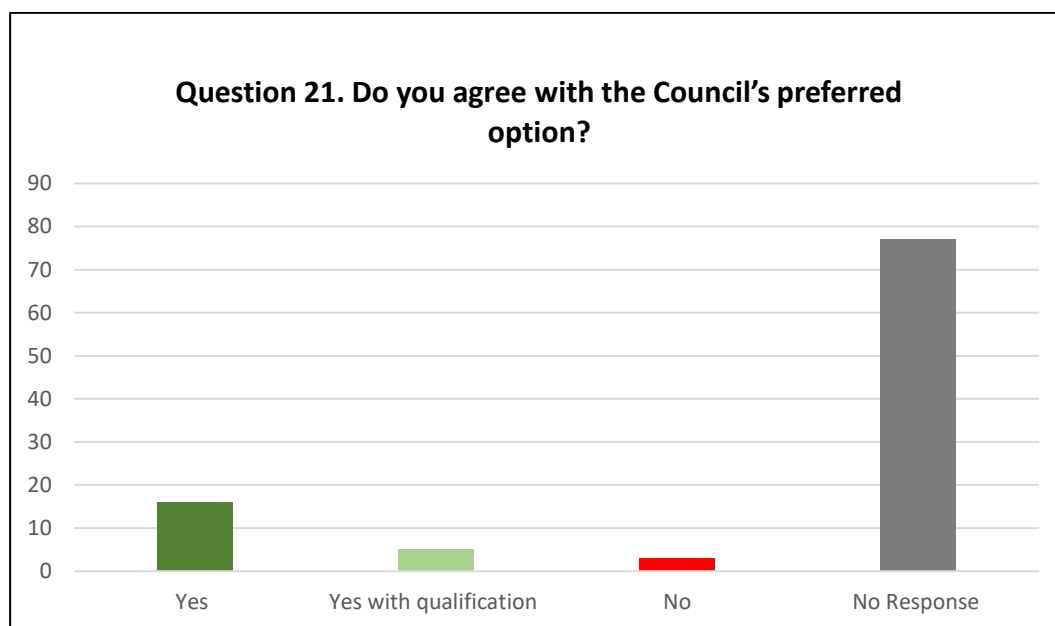
not solely found there. The LDP should contain proposals for the development of an integrated green and blue infrastructure network providing access to amenities for recreation, walking, cycling and wildlife, (see ‘Wellbeing through Wildlife’). The LDP should promote multi-functional green spaces, and stipulate that they will be integral to the planning and design process. Cognisance to environmental considerations should form part of the policy wording to include a demonstration that there is no detrimental impact on biodiversity or on sensitive environmental areas and features;

- With reference to the Sustainability Appraisal Matrices, the following comments are made: Issue OS 3 The potential to enhance Sustainability Options 12 and 13 is noted.
- Acknowledge importance of open space and recreational facilities in terms of health and overall mental and physical well-being. Appropriate development of the site will enable the current green and blue infrastructure to remain insofar as possible thereby safeguarding the current amenity value for future residents/occupants and where appropriate members of the public. Policy should enable alternative development proposals that will support and sustain the retention of these key features. Flexibility should be included in policy to allow the merits of the proposal to be assessed against sustaining such important and vital infrastructure.

4.3.8 Health, Education, Community and Cultural Facilities

Key Issue: CO1: Provision of Health, Education, Community and Cultural Facilities

Preferred Option (Option 2): Review the existing policy framework.



Summary of DfI’s Response:

- While the Council considers there to be no need to zone additional lands for health, education, community and cultural facilities, the Councils desired approach will allow the Council to adapt to changing needs and circumstances over the plan period.
- Regional Planning & Policy Team: Principle of the preferred option is noted and welcomed.

Summary of Other Responses:

- Health, education, also community and cultural needs are vital topics which need to be at the forefront of future planning;
- Mid and East Antrim intend to only protect sites through the LPP where a firm proposal is in place. Policy will set out criteria to support such facilities in locations that encourage active travel and sustainable development;
- Small developments for health, education, community and cultural facilities are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss to ancient and long-established woodlands that need to be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;
- It is welcomed that option 2 acknowledges that the future needs for community facilities may come forward via a non-statutory provider. Voluntary and social economy businesses undertake community and sport provision and this should be accommodated within the plan in future policies and proposals to ensure it contains support for a flexible policy approach for non-council community and open space providers. The plan would benefit from reference to Sports Matters - the NI Strategy for Sport and Physical Recreation (2009-2019) published by SportNI and DCAL. The 2014 update Active Places/Bridging the Gap identifies unmet demand and short falls for a range of sports facilities and feeds into The Sports Facility Strategy for NI. The position in the borough is noted in the technical supplement but given the PRSNI Policy PSU11 is retained there is a requirement to allocate sufficient land to meet the anticipated needs of the community in terms of health, education and other public facilities. Where the LDP has a role in facilitating the provision of community facilities and the zoning of land specifically for this use the requirement for disabled access should be integral in all policies to ensure inclusivity and equality of opportunity and access’;
- These are vital topics which need to be at the forefront of future planning. Our aging demographic would indicate there is a need for both community and care facilities, i.e. retirement village;
- Highlight opportunity for policy consideration aimed at the potential of re-using vacant or underused historic assets, or the grounds associated with them. Such a policy would provide a sense of local identity and consolidate a community relationship within a place. Wording needs to be carefully considered not too negatively impact existing policies relating to changes of affecting historic assets or their settings - to ensure the asset and its setting are protected, conserved and enhanced. In relation to 6.85 ref provision of cemeteries, highlight the importance of the historic environment evidence base. Many of our graveyards which have origins in the medieval and early medieval period are only core elements of what were once much more extensive ecclesiastical sites. Highlight significant potential for encountering archaeological remains including ancient human remains outside of their visible elements;

- Current land held by Government for health, education, community and cultural facilities must not be sold off therefore, available for future expansion;
- Disagree with Council's Option 2 that states there is no need to zone land for education. It is considered that Area Nos 4 & 6 (Annex 3) are required for the future extension of the UU;

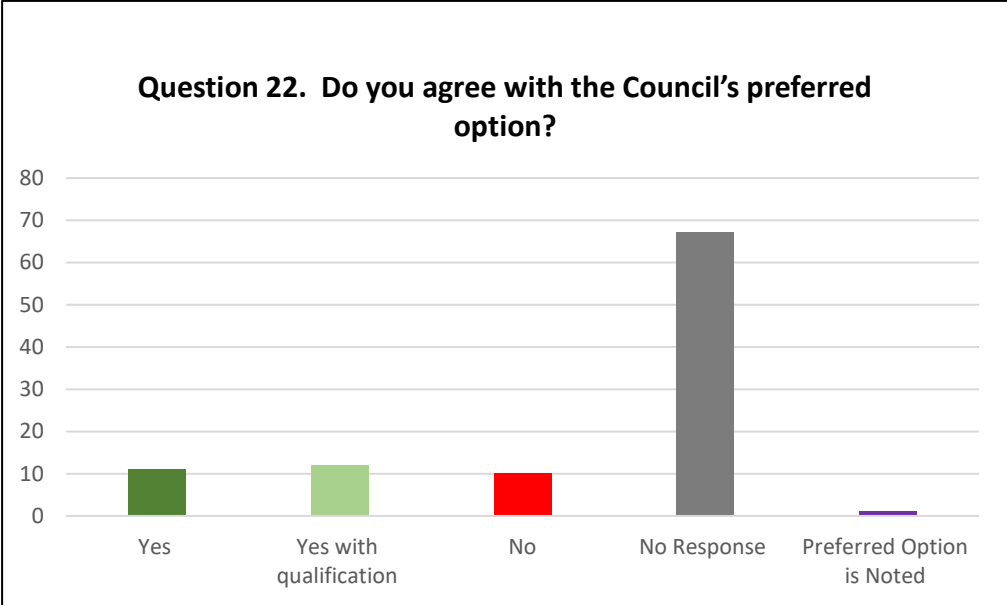
Whilst there may well be no need to zone land for future health, education or community and cultural needs at this juncture, this situation may change in LDP period to 2030. Preferred option enables flexibility that a zoning approach may not. It is difficult to reconcile the preferred option, in the situation where planning in NI is moving towards a plan-led system where the development plan will have primacy. The preferred option could result in a piece-meal non-strategic approach to such facilities, thereby undermining the principles of furthering sustainable development. Land is a finite resource and, as such, the planning system should deliver as much development as possible through development plans that are subject to SEA, informed by a robust evidence base. SEAs can ensure that a development plan provides the amount of development that is needed, whilst also ensuring that this level of development does not exceed environmental limits. A robust Land Strategy for Northern Ireland would further assist in this regard.

4.4 ECONOMY OPTIONS & COMMENTS

4.4.1 Economic Development, Industry and Commerce

Key Issue: ED1: Provision of an Ample Supply of Suitable and Available Economic Development Land.

Preferred Option (Option 2): Review existing zonings and provide policy to facilitate new economic development uses outside of zoned land.



Summary of DfI's Response:

- Acknowledged that on the basis of land allocation only, there is little justification for additional employment land to be identified as the Borough's existing available economic development zonings exceeds current use. Note that only the small towns of Cushendall and Bushmills currently have land zoned for economic purposes. It is unclear if the intention of the preferred option is to extend the potential for economic development in these towns only or to increase opportunities for economic development in the smaller towns overall within the Borough. Notwithstanding, Council should ensure that the preferred option is in line with the RDS SFG 11. Discussion Paper 3 - Employment and Town Centres recognises that a number of methods may be applied to forecast the Borough's future economic land supply needs over the plan period. Council accepts that further work is required to determine if both the supply and job forecasts are reasonable in order to assist in delivering the Council's Economic Development Strategy. In moving forward, Council is reminded of the RDS Land Evaluation Framework and the requirement to assess the suitability of the existing employment land before quantifying future land requirements and identifying a new portfolio of sites.
- DfI Roads - The new economic development uses of existing zonings may not be compatible with infrastructure requirements, for example if a large number of LGV's are

likely to use facilities. Infrastructure needs to be a consideration in any proposed change of economic development use.

- TPMU: Expect Accessibility Analyses to be a feature of the zonings review and a key consideration when considering new economic sites.
- Water & Drainage Policy Division: One of the key principles of Sustainable Water – A Long Term Water Strategy is to support economic growth with modern and sustainable infrastructure. Adequate water, sewerage and drainage infrastructure needs to be in place to facilitate new industrial and residential developments, promote tourism and attract inward investment to the area. When assessing the quantity of land required for business accommodation, provision should be made for green space for sustainable drainage, where appropriate. Innovative ways of dealing with surface water should be considered. The use of sustainable drainage systems as the preferred means of dealing with surface water should be promoted. Land zoning should take account of the local wastewater treatment capacity.
- Regional Planning & Policy Team: Note the preferred option for Key Issue ED1 and make the following comments: - Noted this option would allow for flexibility outside of zoned land where appropriate economic development uses could be facilitated and for consideration to be given to the economic development needs of the smaller towns within the Borough. - Consider further when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy. Appears to be ample economic land in the Borough. Whilst the preferred option aims to review existing zonings and possibly even de-zone economic land, the POP should be mindful of RDS Guidance RG1. The preferred option also allows for flexibility outside of zoned land and for consideration to be given to the economic development needs of smaller towns. Caution is advised here, in that hubs and clusters of hubs should be considered first when new economic development opportunities are being considered (RDS SFG11).

Summary of Other Responses:

- Agree with preferred option 2 insofar as reviewing existing zonings and providing policy to facilitate new economic development outside of zoned land. However, in our (Mid and East Antrim) POP we had explored an approach which had elements of your preferred option 3 in it allowing greater flexibility within existing economic zonings for compatible non-economic uses including where they would complement the current businesses;
- Table 16 does not indicate where the location of land take up and remaining lands are. Support Option 2 as it allows for new sites adjacent to existing well-serviced zones where there is the potential to expand, to come forward;
- Concerned that preferred option will make zoned economic development land redundant, with the opportunity to allow economic development outside of zoned land. This begs the question, what then is the point of zoning land for economic development if it can then be allowed anywhere. Also, important to highlight that option 1 scored higher than option 2 in the SA - the justification for option 2 states the preferred option scored the most sustainable overall in the SA - this is incorrect. As the plan is evidence based, what is the justification for not choosing the most sustainable option?

- The Council notes the options to provide for an ample supply of Economic Development lands, including the Atlantic Link Enterprise Campus. It will be important for the two councils to consider carefully their economic development lands in relation to each other and to the wider NW region, in conjunction with Invest NI and the Department of Economy. In particular, any proposals for Ballykelly/Shackleton need careful co-ordination in relation to the Council's lands at Campsie, Maydown, CODA and the Lisahally Docks;
- Such economic development should be in line with Growth Sectors and Education and Skill training aligned to same;
- Highlight the need for Council to ensure that “economic development land” is identified in the countryside for aggregates and minerals extraction. There is a clear direction to councils in the SPPS that in preparing LDPs councils should bring forward appropriate policies and proposals that must reflect the policy approach of the SPPS, tailored to the specific circumstances of the plan area and refer to two of the three bullet points in paragraph 6.155 in the SPPS which refer to sufficient local supplies and safeguard mineral resources;
- Stress the huge significance of the construction industry locally as a provider of jobs, an importer of wages back into the Borough, as an important knowledge based industry and as the key contributor to the development of the Borough's built fabric. The industry's significance is all too often under-estimated;
- Caveat that economic development should not be the primary or sole factor in deciding on zoning or determining individual applications;
- Agree with Option 2 which incorporates Option 1 and would facilitate the de-zoning of lands with low take up and the zoning of more appropriate land to meet future economic need. Notably, the POP identifies that often existing zonings are occupied by non-economic development uses such as retail. We agree that the Council's preferred option will provide greater flexibility in addressing economic development as it will allow for these zonings to be reviewed in full. Furthermore, where it is not feasible to extend the Settlement Development Limits (SDL) of small settlements to provide additional economic development land we advocate the use of brownfield sites in the countryside in close proximity to such settlements. This would create local job opportunities and give the Council the opportunity to secure landscape and environmental benefits. We note the Council's intention to retain the policy approach to PPS4 and corresponding SPPS paragraph and broadly agree with the approach. We would endorse the principle of this approach, as long as the full aspiration of option 1 is subsumed within option 2 in that the review can in tandem de-zone land where it has been proved that uptake is low or it is not appropriate;
- Access to existing services must be considered when looking at new zonings with necessary key site requirements to accommodate the development or developers contributions sought to provide additional services;
- Industry and Commerce must develop on brown field sites or wasteland areas (other than existing business expansion);
- Economic development in the Borough should be addressed quickly, particularly in Dungiven where there is no land zoned for economic development. When considering the nature of local employment base in the Borough, plan should take into account

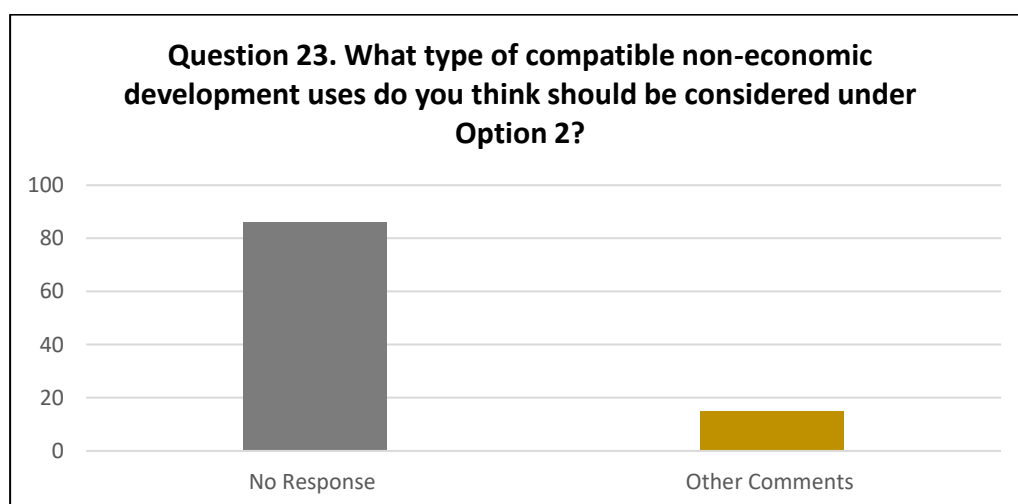
economic need. Consideration should be given to the economic development needs of towns, not just hubs. It should provide a policy framework for new economic uses which may come forward in the future;

- Option 3 is preferable. More flexibility required to stimulate and deliver development on economic land zonings. Mixed use developments should be encouraged. Existing industrial/employment zonings and sites should be reviewed, with sites reallocated for other uses where appropriate. Example of Bendooragh provided;
- Overall priority should be given to an approach based policy, with perhaps greater allocation of white lands and reduction of pink zonings as these areas are over-provided and weak;
- Agree with preferred option 2. Further, this option will allow for consideration to be given to the economic development needs of smaller towns, and provides a policy framework for new economic uses that may come forward;
- Further clarity required. Development is not inherently sustainable, it only becomes so if it incorporates environmental and social considerations. Economic growth alone does not constitute sustainable development. There is a clear distinction between economic growth and sustainable economic growth that is compatible with, and ideally enhances, social and environmental objectives. It is vitally important that the LDP does not conflate, nor substitute, sustainable development with economic growth. Unclear where the Employment Land Evaluation Framework approach in the RDS and the environment sit in the preferred option, particularly regarding ecosystem services upon which the economy and society relies. All employment zonings should be revisited as per the RDS framework, which will help identify what, if any, unimplemented zonings could make a positive contribution to furthering sustainable development. The POP does not set out a quantity of economic development land required, only an ample supply. Care must be taken that the LDP does not burden the environment with additional land that is not needed. Given the current availability, it is not considered sustainable simply to add to the existing quantity. Quantum and location will be vital considerations moving forward. The zonings should not compromise environmental integrity. The re-use of previously developed economic development sites and buildings for other uses must demonstrate how the principles of furthering sustainable development are achieved. Where there is a need for additional economic sites, greater emphasis should be made to the commitment of exploring brownfield sites. The POP fails to place any emphasis on sustainability or exploring brownfield sites for future economic sites or the re-use of vacant/under-used lands last used for economic development. The LDP should steer development away from sensitive sites, including those out with the protected site network. Clarity is required re 'provide policy to facilitate new economic development uses outside of zoned land'. If this means that the policy could facilitate new economic development uses outside of zoned land, then object as this is considered to be ad hoc, piecemeal planning which undermines a planned system. As land is a finite resource, the planning system should deliver as much development as possible through development plans that are subject to SEA, informed by a robust evidence base. SEAs can ensure that plans provide the amount of development that is needed, whilst also ensuring that this level of development does not exceed environmental limits. A robust Land Strategy for NI would further assist;

- LDP must provide a supportive and flexible policy framework for economic development, including the expansion of existing economic development uses;
- Retail NI endorses the preferred option approach of undertaking a full audit (capacity study) and review of the existing employment locations to determine land availability and demand. However, would have reservations in respect of the release of employment land for other uses and specifically for retailing or mixed-use development outside of designated centres. Different types of industry and land uses require different locations and development needs. It is acknowledged that there is still a significant amount of land zoned for industrial/employment use that remains undeveloped around the Borough. Likewise, several previously used sites have now become redundant or are unsuitable. The re-use of existing sites and buildings should be actively encouraged by the plan. It may be appropriate to issue “a call for sites” and seek to match business profiles with existing sites. This may result in the growth of Enterprise Zones to encourage new economic development and regeneration of existing underutilised employment sites. Smaller and older sites may be more suitable as potential redevelopment opportunities for alternative uses. This would need to be considered on a site-specific basis, dependant on a clearly identified need and that the proposals being sought are committed developments rather than speculative. In cases of Major Employment locations, these should be at strategic locations, near transport intersections. In other locations of existing employment, growth must be considered based on the available floor space and the ability to organically grow over the life of the plan. This would need to be considered on a site-specific basis and requires an understanding of future requirements. Existing employment land must be given protection to avoid it being lost to unfettered and unacceptable uses. To include all sui generis uses, could be open to severe manipulation, which would not accord with the intention being sought to enable flexibility of suitable business uses. This requires further consideration and careful wording. Any proposed alternative sui generis use would need to be complementary to the existing land uses, so that there are no compatibility issues or harm to established businesses. Alternative uses must not be introduced which would preclude industrial and warehousing type uses;
- The low take-up of land in the borough reflects the global shift in manufacturing industries to locations where labour is cheaper. Coleraine town currently has a 70-year supply of land for economic use (Local Planning Office study 2015). Zoning of large swathes of land for potential (and space-hungry) industrial users is a throw-back to an earlier era. The economic environment is fast changing and difficult to predict over the plan period; even call centres have come and gone, leaving one unfinished example on economic use land in Loughanhill Industrial Estate. In the meantime, the sterilisation of "industrial" land, by barring other appropriate uses is no longer sustainable. Some uses, such as retail, may be better directed to town centres but commercial leisure or recreational uses should not be excluded. These uses can provide more employment than a comparative floor space of industrial use. Industry, which is generally cleaner than in the past, is more compatible with a diverse range of other activities which could form the basis for vibrant mixed-use areas. A much more flexible, case by case, approach needs to be taken as to what would constitute compatible development, to stimulate development and regeneration in these areas and the wider borough;

- The amalgamation of Options 1 and 2 would appear to be the most appropriate. It would allow the Council to establish if existing zoned land should continue to be zoned or re-classified. It will also allow for an assessment of the interest in the land i.e. has there been any committed planning on site, development commenced etc. and to reassess the needs of business against existing infrastructure provision. Also allow other land to become readily available where an intention is demonstrated and a phased approach could be adopted for existing zoned land or an opportunity to de-zone could arise in substitution for other lands. The flexible approach would allow for new economic proposals to be assessed against the merits of the site and enable development opportunities where these may not necessarily meet current town centre locations. Given the reliance of the Council area on tertiary industry this is a more appropriate and forward thinking approach where it would not result in detriment to the vitality of a town centre. However, the Council should also consider and give weight to the changing culture and viability of town centres which is influenced and dictated by current business and e-commerce trends.

Economic Development, Industry and Commerce



Summary of DfI's Response:

- No Response

Summary of Other Responses:

- Non-residential community uses/recreational facilities should be considered where uptake is low or there is no firm prospect that the industrial zoning will be developed;
- Unsure, potential examples would be useful;
- Leisure and sport facilities and activities are central to community development;
- It is not immediately apparent that preferred option 2 considers compatible non-economic development uses – certainly not on zoned economic land. This appears to be more akin to preferred option 3? In our (Mid and East Antrim) POP we had suggested some potential compatible sui-generis uses to stimulate discussion on this

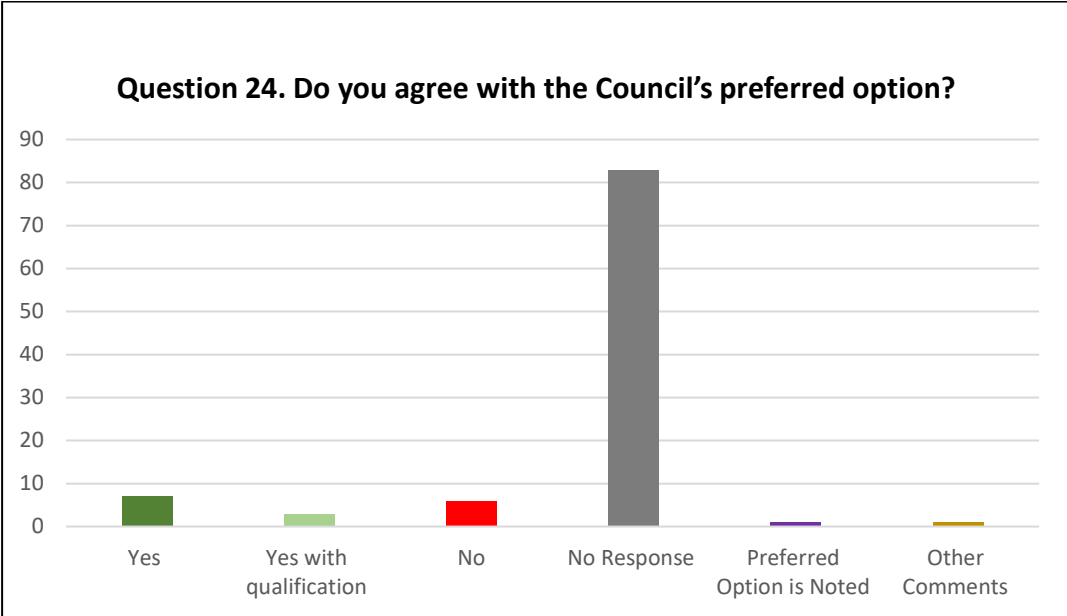
matter, however, given the consultation responses, it has not yet been decided whether to prescribe uses in policy wording as to generalise uses may not be helpful when assessing the individual circumstances of each particular zoned site;

- Provide blueway/greenway routes to benefit social/well-being issues e.g. Lower Bann;
- Leisure and Sport activities central to Community Development - applicable to all ages;
- Question appears to refer to Option 3, not option 2;
- Highlight need to consider the protection, conservation and enhancement of heritage assets and their settings, in relation to future development use /class types, in line with the SPPS strategic objectives towards archaeology and built heritage;
- Sites of mineral extraction for example often have existing buildings on site suitable to reuse or extension and often provide ample opportunity to screen prominent development such as warehouses or plant machinery without the need to encroach into Greenfield sites within or adjacent to small settlements. Sites such as these can often be controlled by applying Key Site Requirements (KSR).
- Consideration could be given to provision of or extension of Park & Ride facilities if the location is deemed suitable;
- Option 3 refers to non-economic development uses (not option 2 as stated). List of examples provided, with housing in appropriate circumstance also included. Retention of vacant or derelict industrial sites in poor locations is not a viable option;
- As an area that is growing in popularity for tourism, need to consider the potential for land uses to be assessed in support of the tourism and visitor industry. Not necessarily for accommodation, but for parking hubs, entertainment etc;
- Queries this question, as the preferred option makes no reference to compatible non-economic development uses on economic zoned lands. This is only referred to under Option 3. Reference is made to PPS 4, Policy PED 7: Retention of Zoned Land and Economic Development Uses until such time as further clarity is provided;
- Until such time as further clarity is provided, reference is made to Policy PED 7 Retention of Zoned Land and Economic Development Uses of PPS4 (which remains valid at this time).

4.4.2 Economic Development, Industry and Commerce

Key Issue: ED2: Atlantic Link Enterprise Campus (Enterprise Zone).

Preferred Option (Option 1): Zone land and provide policy to facilitate the expansion of the Enterprise Zone



Summary of Dfl's Response:

- Note that 14 hectares of the 16 hectare site remains undeveloped. Whilst it is accepted that the concept of enterprise zones is not formally recognised in regional planning policy, Council is reminded that policies should be realistic, appropriate, proportionate, and founded on a sound evidence base.
- Regional Planning & Policy Team: Note the preferred option for Key Issue ED2 and make the following comments:
 - Noted that the concept of enterprise zones is not formally recognised in regional planning policy. It is also noted that 14 ha (35 acres) of the 16 ha (40 acres) site remains undeveloped.
 - PPD will consider further when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

- This would be for CCGC to determine;
- Question the rationale of proactively identifying land to facilitate growth when 35 acres of the enterprise zone remain undeveloped. This could send a wrong message to investors that development within the enterprise zone is not prioritised. Also concerned that the identification of additional and unnecessary lands for development would place avoidable pressure on the environment, reducing landscape resilience, hampering climate change adaptation, reducing biodiversity, removing opportunities for improved health and well-being and eliminating vital ecosystem services. As with any

development, ancient and long-established woodlands need to be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;

- It will be important for the two councils (DC&SDC and CC&GBC) to consider carefully their economic development lands in relation to each other and to the wider NW region, in conjunction with Invest NI and DfE. In particular, any proposals for Ballykelly/Shackleton need careful co-ordination in relation to the Council's lands at Campsie, Maydown, CODA and the Lisahally Docks;
- The Enterprise Zone, while being very important, is not the only growth opportunity in the area. As long as any buildings developed for it do not encroach on the local surroundings and are aesthetically suitable. With the NI Food focus on local producers and an increase in variety of locally produced quality artisan products, consideration must be given to encouraging this area of entrepreneurship. The Nexus Report talks about lack of range of shops in Portstewart, diversity aligned with small business & production is to be encouraged. As is also found in the research Sproule Report (Portstewart) there is a need to find ways to encourage longer stays and again recognise the demand for a wider variety of shops;
- Acknowledge need and desire to support business development through allocation of economic development lands. Important that the Council is in position to demonstrate how historic environment evidence has been used in informing zonings and mitigation such as designation, or need for appropriate key site requirements at Plan Strategy stage, i.e. We advise the historic evidence be utilised to indicate historic settlement patterns to aid zoning and aim toward proposals which respect and enhance character and aid good design and place making. May be potential for impacts on heritage assets and their settings, e.g. due to utilising/or alterations to historic buildings, or development located in the setting of heritage assets, which need to be considered. Highlight the potential opportunity of re-using vacant or underused historic structures and sites (both designated and non-designated). Creating an opportunity to lead to the adaptive repair and re-use of a heritage asset and encourage high quality design under sound conservation principles. Policy must be in line with SPPS strategic objectives towards archaeology and built heritage. *Specifically note mention of Aghanloo Industrial Estate in 6.88 - this disused World War 2 Airfield contains a number of important heritage assets including scheduled monuments. Have reviewed the NAP map LYED 01 and, in considering this zoning going forward, there is a need to consider the scheduled zones dataset which forms part of the historic environment evidence base and provides a spatial illustration of the scheduled monument areas in the airfield. Also policy in developing within the former airfield should be heritage-led, being mindful of its WW2 heritage and layout;
- Option 2 is generally more flexible as there is no indication of how the Enterprise Zone is going to evolve. In the past, always idea to put a line around everything - but may not be the best way in moving forward. Need every opportunity to be explored to make the most of the zoning;
- The Enterprise Zones (NI) Order 1981 provides for the creation of Enterprise Zones. Section 39 of The Planning Act (NI) 2011 has the effect on the effective date of the

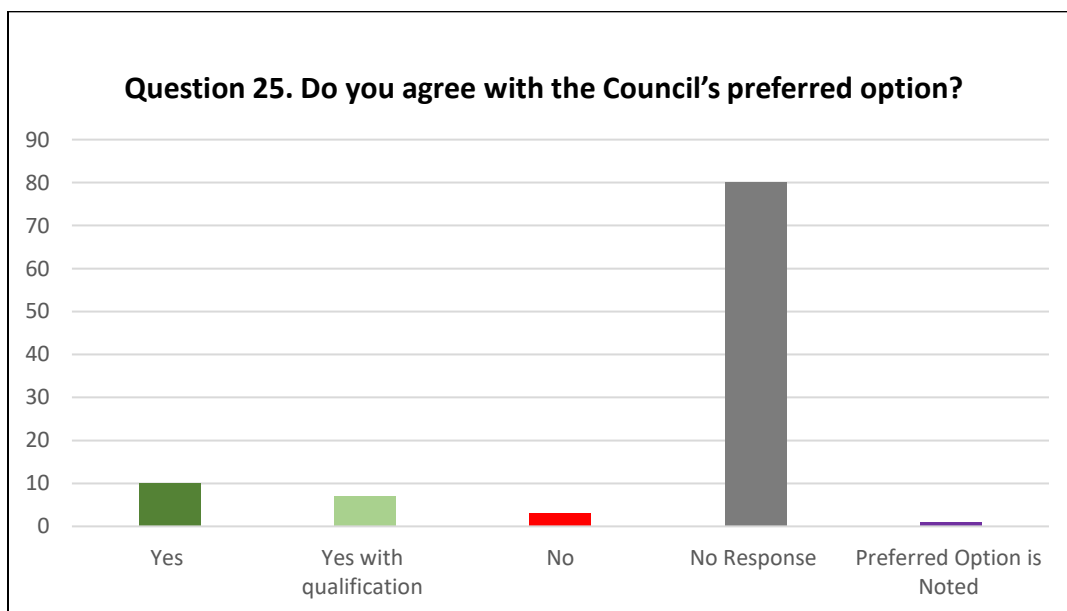
Enterprise Zone to grant planning permission for development specified in the scheme or for development of any class so specified. Clarity is therefore sought on whether the Council wishes to extend the Enterprise Zone within the context of the 1981 Order and subsequent deemed consent for the specified development within that zone by virtue of the 2011 Act, or whether it simply represents a physical extension to the enterprise zone and any future development will be subject to the rigours of the normal planning application process. Strategic employment allocations should be based on a robust evidence base (Stage 2 of the Employment Land Evaluation Framework) and be set within environmental limits;

- R&D and knowledge-based industries continue to see growth across the world. When considering the high-quality education facilities, NI should be aiming to be a centre and “hub” for training and supply of world class employees in these areas. This will encourage growth and investment across the Province. To ensure the best talent is obtained companies may seek to be located near the institutions that produce it, which may encourage inward investment. Retail NI is fully supportive of the preferred option. However, better option may be to zone a smaller area for growth and provide policies for the remainder. This will ensure greater flexibility and will act as a catalyst for investment for complementary uses, which will be supportive of the Enterprise Zone.

4.4.3 Retailing and Town Centres

Key Issue RT1: Retail Centre Hierarchy

Preferred Option (Option 3): Review existing hierarchy and identify new centres.



Summary of DfI’s Response:

- Options 1 and 2 are unlikely to be viable alternatives as they would not allow the Council to review the existing retail hierarchy and align it to the outcome of the proposed settlement hierarchy review set out in key issue SG2.

- The preferred approach, however, would allow the Council to acknowledge the role and function of rural centres in line with paragraph 6.277 of the SPPS. Council is reminded that SFG10 of the RDS states that an assessment of settlements and surrounding rural areas will assist in identifying their roles and functions. Accordingly, the Council should use the Hierarchy of Settlements and related infrastructure diagram (2.1) to help identify the level of appropriate services and facilities.
- Regional Planning & Policy Team:
 - Highlight Paragraph 6.277 of the SPPS. In addressing this particular point (at para 6.98) the POP has omitted the town, district and local centres terminology and recommends a review of the existing hierarchy and identifying new centres (including the role of villages).
 - PPD would recommend that Option 1 'Retain Existing Hierarchy' would be a more acceptable approach as Paragraph 6.278 of the SPPS already provides a policy direction for shops and villages and small settlements.

Summary of Other Responses:

- Town centres going through a period of change - becoming more a leisure area - should be promoted as such. More out of town centre shopping should be provided within the district;
- Small retail developments are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss of ancient or long-established woodland. Given the prevalence of ancient and long-established woodlands in rural areas, they must be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;
- Agree to a comprehensive and consistent review. In Coleraine, the need is not to retain the existing town centre boundary, but its strategic role as the most desirable location for new retail and commercial development;
- Issues and options noted, including the two retail/business reports. They do not cause particular issues for the Derry City and Strabane District area;
- The retention of village shops and amenities is vital to the survival of many villages in our area. Support for local small business should be a preference to multi-nationals;
- Assume that the centres referred to are within towns and villages and do not refer to out of town centres;
- Option has potential to have uncertain effects on the historic environment, due to the potential impacts of utilising/alterations to heritage assets or development located affecting their setting, plus impacts on below ground archaeology which should be part of the considerations for any classification and therefore, potential growth. Is an opportunity to capture the full potential of the historic environment and heritage assets in this process within town centres and for them to play a key role in informing the distinctive character, quality and design in the town centres? Highlight HED Gazetteer of Nucleated Historic Urban Settlements, for use in review of the settlement patterns,

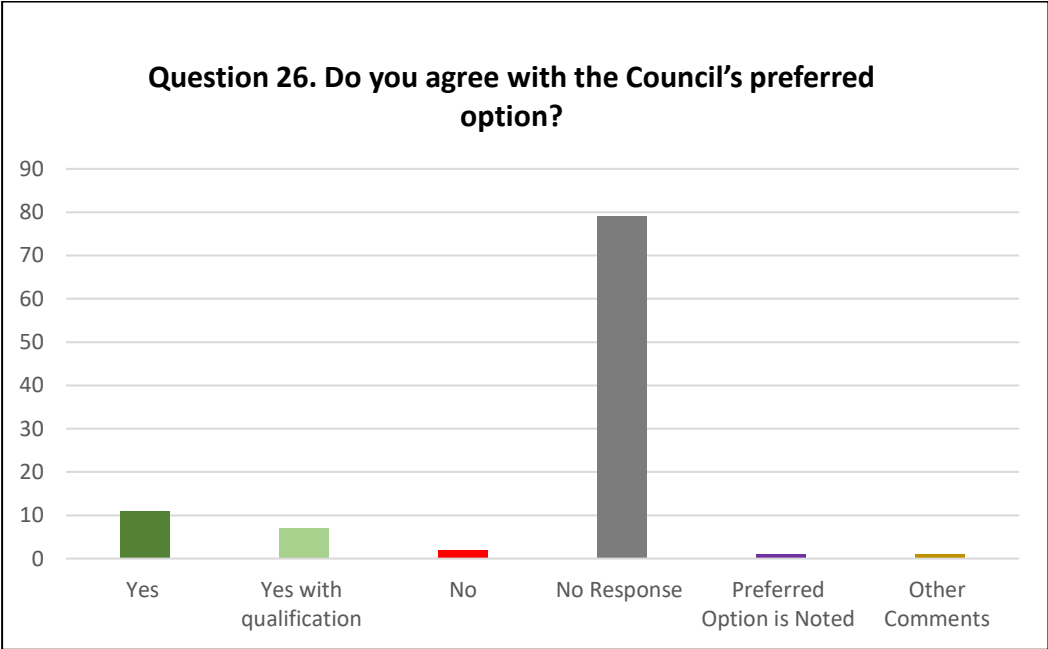
historic boundaries and understanding the development evolution of settlements—informing planning for future growth, designation or regeneration. NOTE: the historic environment is the microcosm (heart) of wider settlement growth in terms of development patterns and its consideration as such is not evident in the POP;

- Priority should be continuity as some of these decisions could take time;
- It is considered reasonable that the retail hierarchy be reviewed and that villages be included in the hierarchy
- Discounters also bring a real benefit to the less affluent sections of society by their policy of providing a limited range of goods at the cheapest prices on a UK basis. These customers tend to find travel to supermarkets relatively expensive. There is an obvious social benefit to allow discounters greater flexibility in location than conventional supermarkets to allow them to site stores in areas of greatest social need. These are often well away from established shopping centres. For discount retailers who need to be close to their market for the social factors identified above, the current town centre first policy could prevent them from locating in areas where they can be of most benefit. For these reasons, Lidl supports the identification of new centres where a discounter could beneficially augment retailing provision in the town (Key Issue RT1 Option 3);
- There are a considerable number of issues facing NI towns and cities, which were identified in the GL Hearn Report produced for the DOE in January 2014. The findings advocated a stronger policy stance on protecting and enhancing town centres, which was adopted in the subsequent SPPS. It is accepted by all that retailing is a dynamic function and has evolved considerably in the last 5-10 years with the rise of online and mobile commerce in respect of comparison and convenience goods. Likewise, a change in consumer spending habits due to the economic recession has seen convenience retailing shift from large weekly trolley shops to smaller more frequent visits at a variety of locations. Planning decisions can only be reached in an evidential context and the SPPS clearly states that LDPs are informed by robust and up to date evidence in relation to retail need and capacity. Retail NI is pleased that the Council has undertaken independent research to inform its approach to retailing in the Borough at this early stage. Unfortunately, town centre health checks did not take place under Central Government. Retail NI endorses the classification of a hierarchy of centres based on their size and function. The introduction of a lower retail impact assessment threshold dependent is prudent and seeks to safeguard centres in accordance with the direction of the SPPS. It is noted that the Riverside remains problematic, due to the historic and causal approach to granting permission for open Class A1 retail and main town centre uses. Retail NI endorse the preferred option. In addition, we would suggest that a “Glossary of Terms” be produced in the Local Policies Plan, so that small scale emerging Local Centres or Village Centres can benefit from policy protection as they develop. This was previously included on Page(s) 29 -30 of the withdrawn PPS5. A “Glossary of Terms” provides the most acceptable and logical tool for defining and interpreting centres and for defining new forms of retailing over the life of the plan and when monitoring.

4.4.4 Retailing and Town Centres

Key Issue RT2: Town, Village and Local Centre Boundaries

Preferred Option (Option 3): Review existing boundaries and include new boundaries.



Summary of DfI's Response:

- Preferred option would allow the Council to review and include new boundaries if deemed appropriate in line with the intended settlement review. This option would also allow the Council to consolidate existing local centres as a focus for local everyday shopping. Council is reminded of the requirement to ensure that the role of local centres is complementary to the role and function of the town centres and that extensions should only be permitted where it is demonstrated that no adverse impact will result on town centres within the catchment.
- Note that extensive research has been undertaken to establish current and future retail trends, as well as a quantitative and qualitative assessment of retail facilities and future population and expenditure levels within the Borough to determine capacity and need over the plan period. This section would have benefited from greater pull through of base evidence to assist the reader with the appraisal of options and justification of the preferred approach.
- Regional Planning & Policy Team: Note and welcome preferred option. Reiterate point that this 'comprehensive and consistent approach' should apply to town and local centres (but not village centres as listed).

Summary of Other Responses:

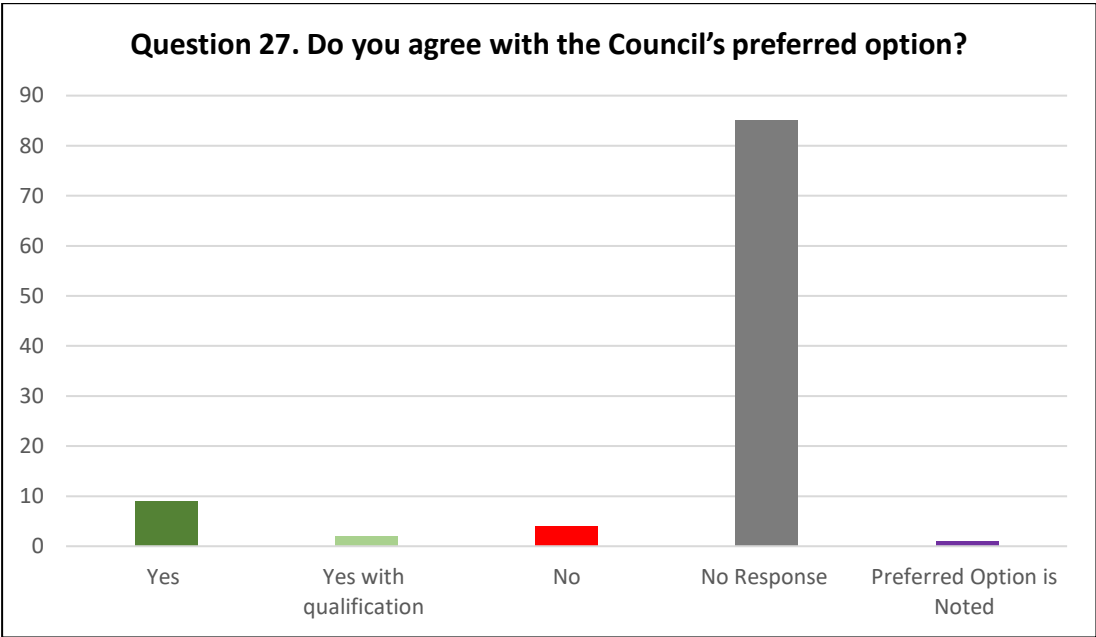
- Sustainability is undoubtedly the major concern as we look to the future of town centres and centres of smaller settlements. Present policy has no answer to the current, inexorable decline of our town centres;
- New boundaries - necessary protections to be given to all important or sensitive habitats that may now find themselves within a new settlement area and therefore in consideration for development. Given the biodiversity value associated with ancient and long-established woodlands as well as their irreplaceable nature, in conjunction with the fact that small developments such as those associated with housing, retail or amenity are cleared not spatially dependent and nor are they of regional significance. There is no reason why they should be located where they will cause damage or loss to ancient or long-established woodland;
- The preferred option should be extended to ensure any policy provides flexibility to permit the threshold to be exceeded if a specific business case can be made to show the premises are no longer viable for retail use. Retail is under extreme pressure. Sproule reports indicate linked trips for convenience and comparison shopping common in the hubs (incorporating a visit to eat and drink in their trip). Shows the presence of cafes and restaurants can assist in providing the opportunity for greater dwell time in centres and opportunity for sustainable linked trips. On this basis an allowance should be made of unviable units of specific sizes to be excluded from the policy controlling non-retail uses in primary retail cores subject to satisfactory evidence showing the attempts made to reuse the units from applicants. This would improve the plan by 'future-proofing' it against further changes in the retail property market;
- Issues and options noted, including the two retail/business reports. They do not cause particular issues for the Derry City and Strabane District area;
- Proviso that any review or redrawing of boundaries should not extend to include out of town areas that could then become retail centres;
- Highlight that identification of a town/district/local centre boundaries should take an informed and clear account of the historic core evidence base which form the origins of any settlements – it will reinforce distinctive character and local identity. Heritage assets and historic boundaries should be illustrated in town centre boundary maps at PS Stage. Policy wording needs to be considered carefully so as not to impact negatively existing policies, which relate to changes of listed buildings, in line with the SPPS strategic objectives towards heritage assets;
- Extending existing boundaries should only be allowed if necessary services are available to sustain development;
- Continuity is a priority as some of these decisions could take time;
- It is considered reasonable that boundaries be reviewed. Existing local centres should be retained as Local Centres. Consideration should be given to designating additional Local centres as appropriate (Option 3) such as, Milltown Road and Ballybogy Road in Ballymoney, Ramoan Road and Moyle Road in Ballycastle, Ballyquinn Road in Limavady and Coleraine Road, Portstewart;

- In relation to villages it is considered that they should not have designated centres identified within them. The village itself constitutes the centre within its rural area hinterland;
- The Definition of Town Centre Boundaries / Retail Centre Hierarchy - The constrained nature of the town centre boundary in Ballycastle and Dungiven has meant that Lidl have been unable to find a suitable site. In the case of Ballycastle, this has resulted in a search that has gone back almost two decades. In this context we agree that existing town centre boundaries should be reviewed and new boundaries should come forward that would provide the opportunity for a discount food supermarket to be located within them because they meet a qualitative need (Key Issue RT2 Option 3). Without a discounter, retail provision in both of these towns is deficient;
- Traditionally, town centres have been too constrained to accommodate growth and provide flexible and varied floor space for both national multiples and local independents. This has without doubt resulted in a proliferation of edge-of-centre and out-of-centre retail proposals. Town, Village and Local Centres should allow for sufficient growth over the plan period, identify redevelopment sites or where sites can be amalgamated to provide sufficient floor space for larger retail units. The preferred option takes account of the direction of the SPPS and the overall review of the existing retail hierarchy and associated boundaries.

4.4.5 Retailing and Town Centres

Key Issue RT3: Primary Retail Cores – Acceptable Uses

Preferred Option (Option 1): Retain dominance of A1 uses by setting a minimum threshold on their presence in Primary Retail Cores.



Summary of Dfl's Response:

- Whilst the preferred option is commendable in theory, it is unclear as to how this approach would work in practice. Would the threshold comprise a percentage of units within the retail core and how would the Council consider applications for non-A1 uses if the threshold was not met? Careful management of such an approach would be required in order to ensure that it does not have unintended consequences and give rise to vacancy or dereliction. Council is reminded that one of the regional strategic objectives of the SPPS is to secure a 'town centre first' approach for the location of future retailing and other main town centre uses which includes cultural, community facilities, retail, leisure, entertainment and businesses. Council should also be mindful of the monitoring requirements associated with its intended policy approach and consider the potential consequences of setting a minimum threshold for the preferred approach under Key issue RT4, which proposes to allow the market to determine the most appropriate mix of evening activities in town centres. In the absence of further detail, it is difficult to appraise to what extent this option will protect and strengthen town centres.
- Regional Planning & Policy Team: Notes and welcomes the preferred option.

Summary of Other Responses:

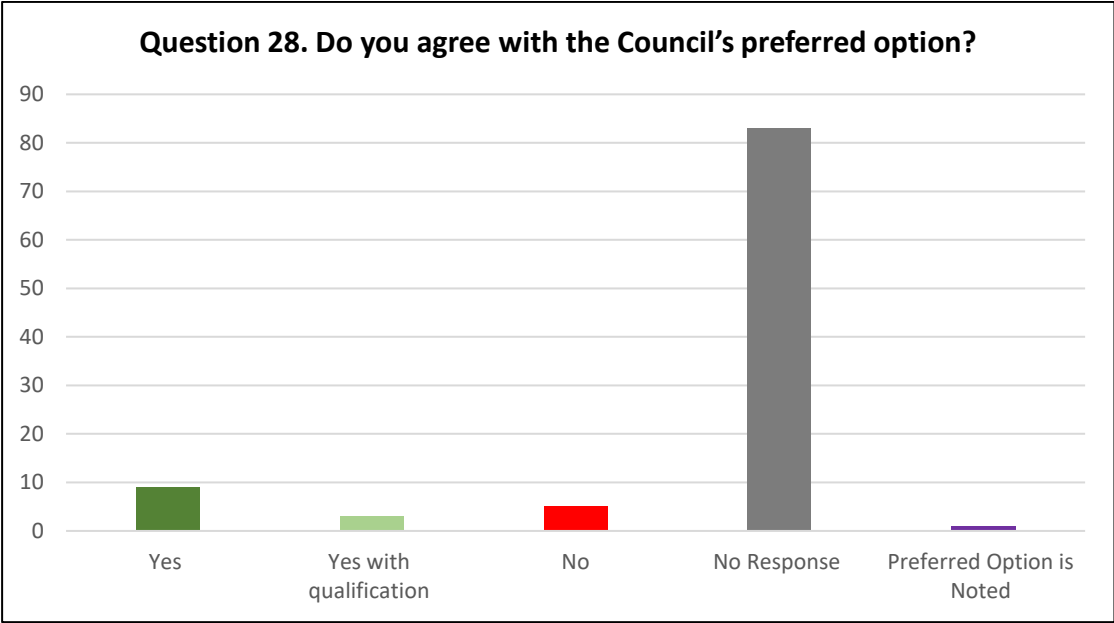
- Flexibility is required as on-line retail continues to impact on small and larger stores in town centres;

- Agree with Option 1 but, to improve the plan, a link through to the masterplan documents should be considered between the location of public car parks and the areas where early evening family entertainment uses are considered to assist in the deliverability of this objective. Need clear mechanisms built in to policy framework for implementation/monitoring which will assist with the soundness compliance;
- Issues and options and two retail/business reports noted. They do not cause particular issues for the Derry City and Strabane District area;
- Highlight the potential opportunity of re-using vacant or underused historic structures and sites (both designated and non-designated). Creates an opportunity to lead to the adaptive repair and re-use of a heritage asset and encourage high quality design under sound conservation principles. Must be in line with the SPPS strategic objectives towards archaeology and built heritage;
- Due to increase in online retailers, town centres have to accommodate more than retail. Should be good mix of services in town centres (list of examples provided including collection points for courier deliveries / click and collect);
- All creative avenues should be explored to keep town centres active. Retaining Option 1 carries a threat that we are not thinking deeply enough. Option 2 has dangers too. Perhaps there is benefit for case by case basis of assessment to keep opportunities open. High Streets - policies need to be flexible to allow for other options;
- The Primary Retail Core must continue to be the focus for A1 uses and the preferred option seeks to achieve this objective. Linked trips have always been a significant and important consideration in driving footfall and other main town centres uses such as cafe, restaurants and pubs can support vibrancy, but should not dilute the retail offer in the defined area. Town Centres must provide flexible and varied floor space for both national multiples and local independents. Perhaps it would be suitable to undertake a “call for sites” consultation exercise to identify redevelopment sites or where sites can be amalgamated to provide sufficient floor space for larger retail units and mixed-use development. This will enable greater opportunities for sites to be matched with commercial profiles to encourage anchor tenants or national multiples to be located within Town Centres. Agreements and contributions can be used to facilitate redevelopment of more difficult sites to ensure there is no diminution in town centre car parking or the quality of the built environment.

4.4.6 Retailing and Town Centres

Key Issue RT4: Town Centres – Promoting an Evening Economy

Preferred Option (Option 1): Provide policy to facilitate a range of uses that encourage an evening economy.



Summary of DfI's Response:

- This option when developed further, could address the potential to generate a new driver for the night time economy as highlighted in the spatial framework guidance of the RDS. The Council should consider the potential link between this option and its aspirations for tourism.
- Regional Planning & Policy Team: Notes and welcomes preferred option.

Summary of Other Responses:

- Some concern as to whether Option 1 will achieve the goal outlined in the justification. Perhaps more flexibility is required as to the actual property use required. Coleraine Town Centre, for example, has never enjoyed an evening economy and it's hard to justify spending resources on a lost cause. The development of a vibrant waterfront economy as in other towns could, however, achieve the desired end;
- Nexus report findings - indicating whether there is a need for further retail and/or leisure activity in the town centre;
- Option 3 offers more scope for the provision for private commercial leisure facilities to support a night time economy. In particular river corridor based recreational opportunities which have been identified through the Bann Strategic Development Group (Comprises Waterways Ireland, Councils, TourismNI, SportNI and HIS);

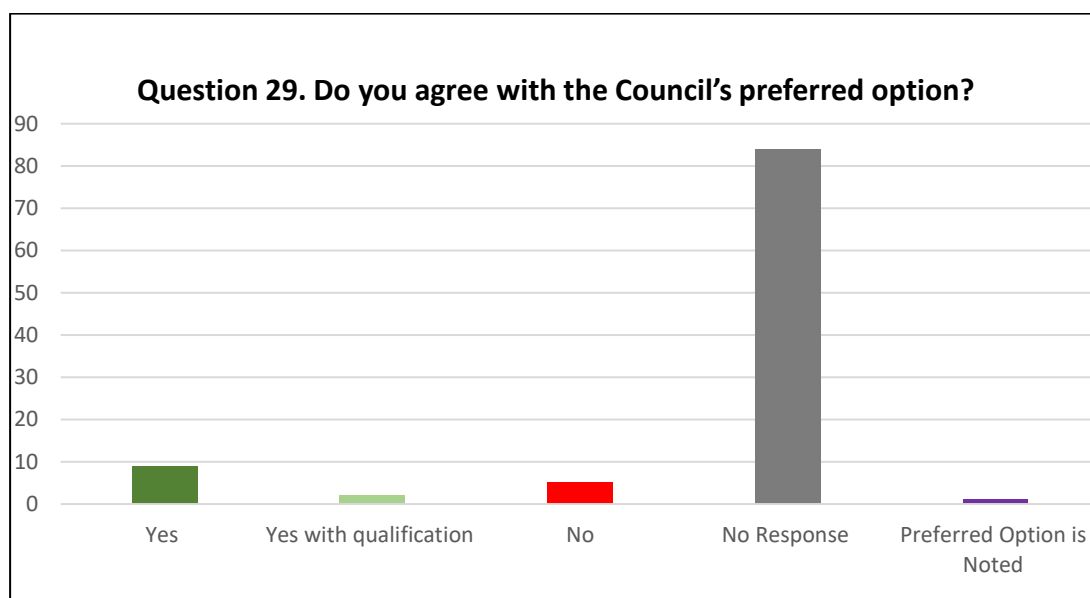
- Recommend that the provision of outdoor/green space be properly considered as a complementary aspect to other evening economy infrastructure. Such space can provide a shared space and also outdoor venues. Additional benefits of well-designed outdoor space that integrates native tree planting include improved air quality (particularly in urban areas), improved water management, urban heat island mitigation, shade and shelter, improved biodiversity and scenic value;
- Issues, options and two retail/business reports noted. They do not cause particular issues for the Derry City and Strabane District area;
- Welcome the proposal. Recognise important role this can play in rejuvenating under and/or unused heritage assets. Highlight that proposed changes to listed and non-designated historic buildings, including development affecting their setting, should protect, conserve and enhance the heritage assets, allowing their unique integrity to remain. Opportunity to capture full potential of heritage assets in this process and for them to play a key role in informing design in the town centres. Highlight the potential impacts of utilising/alterations to heritage assets or development located affecting their setting, plus impacts on below ground archaeology, especially if the (evening) economic objective is allowed to out-balance the sustainability objective of the RDS and SPPS. However, acknowledge opportunity to help address number of vacant buildings through adaptive reuse. Promoting and/or encouraging the 'living over the shop' has potential for policy consideration by offering preference to utilising historic properties, including industrial heritage, for mixed use accommodation in advance of new build to promote attractive and distinct places to live and invest. However, any policy wording needs to be carefully considered not to impact negatively existing policies relating to changes of affecting historic assets or their setting; in line with the SPPS strategic objectives towards archaeology and built heritage. Advocates the promotion of high quality design in all settlement centres. When considering policy for new development in the setting of heritage assets, consideration of existing policies and guidance as well as established sound conservation design principles to achieve sympathetic design. The use of high quality materials, including signage, should also be a consideration. In SA, advise the importance of considering mitigation to offset negative impacts on below ground remains in town centres which contain identified Areas of Archaeological Potential;
- Consideration should also be given to no-parking developments as well, rather than just a reduction of parking. There can be night-time parking as well, so that day time parking becomes available;
- A proliferation of one type of use does not assist with sustaining and enhancing the vitality and viability of existing centres. Improvements to the public realm, permeability and connectivity will enable linked trips and enhance the quality of the environment, which will attract and retain people. The key is making the Town Centres, District Centres or Local Centres destinations for all, where the range and type of uses must be diverse to appeal to the widest number of users and attract significant footfall. They should be the focus of administration, commercial, cultural, leisure, entertainment, arts and retail activity, so they are not limited to the daytime economy. It is the twilight and night-time economies, which need to be considered as catalysts for growth in conjunction with the daytime uses, to maintain vibrancy and reduce vacancy. The introduction of commercial leisure development, arts and restaurants in city and town

centres will encourage people to stay after the traditional 5pm close. It will also provide greater services for tourism. Town centres also provide places for people to live and work. This will undoubtedly assist with the vitality of an area. The protection of existing town centre housing stock also creates a more sustainable environment through the reduction in private car use. Likewise, encouraging offices to be located at 1st floor within the PRC will also drive footfall, along with enabling active street frontages for retail.

4.4.7 Retailing and Town Centres

Key Issue RT 5: Retail Impact Assessment Thresholds

Preferred Option (Option 3): Retain 1000 sq.m gross for Coleraine, Limavady and Ballymoney and reduce to 500 sq.m gross in all other town centres.



Summary of DfI's Response:

- The Council's preferred option will provide a clear demarcation between the Borough's three main town centres and the remainder of its town centres which perform a local shopping function. Commend Council's approach in line with SPPS paragraph 6.283 which gives Councils flexibility to set an appropriate threshold for their area above which all applications for such development should be accompanied by an assessment of retail impact and need.
- Regional Planning & Policy Team: Note and welcome preferred option.

Summary of Other Responses:

- Small developments such as those associated with retail are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss of ancient or long-established woodland. Given

the prevalence of ancient and long-established woodlands in rural areas, they must be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;

- Issues, options and the two retail/business reports are noted. They do not cause particular issues for the Derry City and Strabane District area;
- Concern that over-emphasis of the 'big three' could disadvantage all lesser settlements the 500sqm limit might conflict with what the economic driver of Tourism may demand;
- HED welcome the thresholds, and consider that the reduction of floor area may aid in the sympathetic re-use of heritage assets in smaller settlements. Recognise the important role this can play in rejuvenating under and/or unused heritage assets which provide a sense of local identity, authentic place and distinctive character. Highlight that proposed changes to listed and non-designated historic buildings, including development affecting their setting, should protect, conserve and enhance the heritage assets, allowing their unique integrity to remain. There is an opportunity to capture the full potential of heritage assets in this process and for them to play a key role in informing design in the town centres. Highlight the potential impacts of utilising/alterations to heritage assets or development located affecting their setting, plus impacts on below ground archaeology, especially if the (evening) economic objective is allowed to out-balance the sustainability objective of the RDS and SPPS. However, acknowledge the opportunity to help address the number of vacant buildings through adaptive reuse. Promoting and/or encouraging the 'living over the shop' idea has potential for policy consideration by offering preference to utilizing historic properties, including industrial heritage, for mixed use accommodation in advance of new build to promote attractive and distinct places to live and invest. However, any policy wording needs to be carefully considered not to impact negatively existing policies relating to changes of affecting historic assets or their setting; in line with the SPPS strategic objectives towards archaeology and built heritage. Advocates the promotion of high quality design in all settlement centres. When considering policy for new development in the setting of heritage assets, consideration of existing policies and guidance as well as established sound conservation design principles to achieve sympathetic design. The use of high quality materials, including signage, should also be a consideration. In SA advise the importance of considering mitigation to offset negative impacts on below ground remains in town centres which contain identified Areas of Archaeological Potential.;
- Welcome and encourage support of individuality of local shops in towns across the Borough;
- It is considered that the retail impact threshold should remain at 1,000 sq.m. Reducing the threshold to 500sqm would be overly onerous;
- Evidence base appears to be incomplete because we have not been able to identify information relating to footfall, physical structure and environmental quality of the town centre, prime rental values or commercial yields. SPPS Para 6.285 confirms that these are all matters that should be addressed in a town centre health check. The Sproule Report is erroneously described as a 'Health Check' in the Nexus document but

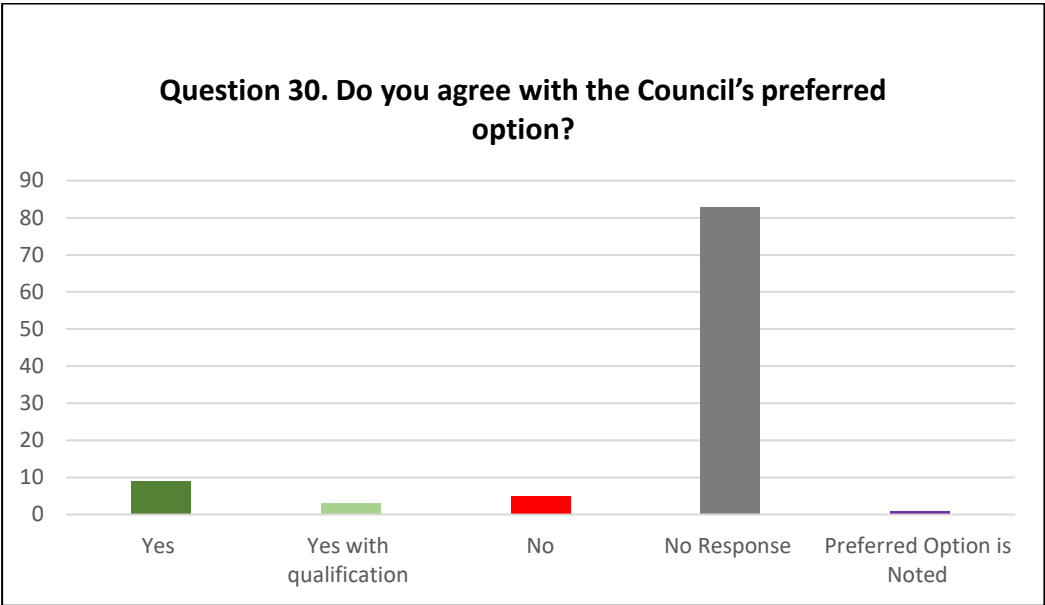
it only deals with shopper and business owner's attitudes and perceptions of four town centres in the plan area – but as the SPPS makes clear this is only one aspect of a health check. Other town centres such as Portrush and Dungiven have been ignored entirely in the Sproule Report. It follows from this, that there is an important gap in the baseline material in relation to the assessment of vitality and viability of town centres across the plan area which have not been investigated adequately or at all. The Council should reconsider its evidence on this issue given that it will go to the 'soundness' of the plan. A robust evidence base is required to justify the preferred option over other alternatives;

- Lidl would welcome the opportunity to comment in a more meaningful way on the issues associated with retailing and town centres when the evidence base becomes more robust. The lack of a full town centre health check has prejudiced Lidl's ability to determine whether the thresholds for future Retail Impact Assessments (Key Issue RT5) are fair and proportionate. However, as they are keen to participate in the consultation process, they make the remainder of the comments without prejudice to any new information arising from the recommended supplemental information gathering process;
- The preferred option and approach to a specific threshold for retail impact assessments is to be fully endorsed. It takes account of the specific context, size, scale and function of each town in the hierarchy and offers an appropriate level of examination to future retail proposals;
- Flexibility must be applied in the consideration of all sequentially preferable sites. We would also suggest the disaggregation of large mixed-use schemes. These are often deliberately contrived to be too large to fit in existing centres, to advance their position at an out of centre location;
- Regular health checks and monitoring will ensure responsiveness and that any reduction in footfall or increase in vacancy can be swiftly identified and a response prioritised. The Council appears to be adopting a responsive approach to retailing in the Borough and we are fully supportive of this type of advocacy.

4.4.8 Retailing and Town Centres

Key Issue RT6: Riverside

Preferred Option (Option 1): Retain the principle of the existing policy framework.



Summary of DfI's Response:

- The Councils preferred option is to retain the principle of the existing policy framework at Riverside. This would see the Business Park remain undesignated in retail policy terms. Any proposals to further develop the Park would therefore be the subject of retail impact and capacity assessments to ensure no unacceptable adverse impact on the vitality and viability of an existing centre within the catchment. This approach is in line with paragraph 6.275 of the SPPS which states that LDPs should contain policies and proposals that must promote town centres first for retail and other main town centre uses.
- Regional Planning & Policy Team: note and welcome Preferred Option 1.

Summary of Other Responses:

- Small developments such as those associated with retail are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss of ancient or long-established woodland. Given the prevalence of ancient and long-established woodlands in rural areas, they must be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;
- Given the strong overlap between Riverside and the town centre, it is agreed Option 1 is the correct approach. This takes account of the findings of the Nexus retail report and

the need to promote the delivery of the envisaged retail capacity for Coleraine for the town centre and maintain the differentiation between the two destinations, to minimise the overlap of trade between the two areas;

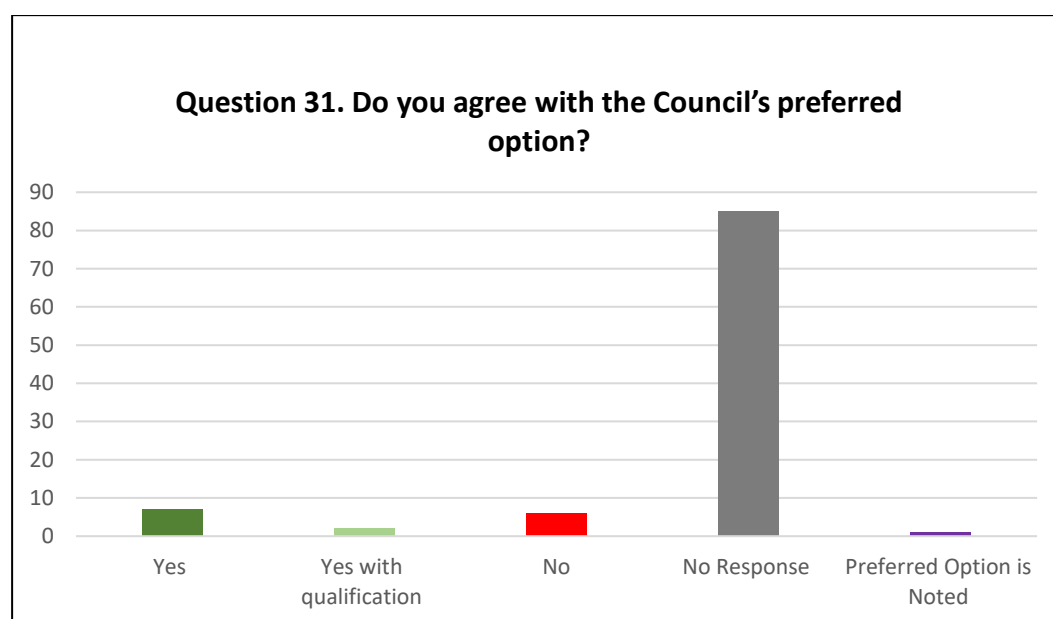
- Issues, options and the two retail/business reports are noted. They do not cause particular issues for the Derry City and Strabane District area;
- Not relevant to residents from southern and western side of Borough as there are closer cinemas in Derry and Maghera;
- Land, spaces and infrastructure around Riverside Retail Park need to be explored and issues resolved;
- Support preferred Option 1 in terms of retaining the principle of the existing policy framework that relates to Riverside. However, disagree with the statement in Option 1 regarding the need to consider the retail impact of any proposal at Riverside on the town centre. The requirement to assess the retail impact of future proposals at Riverside on the town centre should be based on the retail impact assessment threshold size approach referred to in Key Issue: RT5.
- Riverside plays a very important part in the economy of Coleraine town. Given its location, it caters mainly for car borne shoppers for the purchase of bulky goods and purchasing food in bulk. Either way, Riverside clearly offers a different type of retail to Coleraine Town Centre which includes smaller unit shops selling mainly non-bulky goods. Riverside's retail offer and function therefore has little overlap with the town centre and is therefore complementary to the town centre;
- Retail locations like Riverside act as pressure valves in accommodating the type of retail that cannot be accommodated in town centres by allowing for new retail entrants to take up locations in towns and complement the town centre retail offer;
- Maintaining the principle of the existing policy framework at Riverside will allow for an appropriate amount of flexibility to allow the potential for new retailers and retail formats to trade in Coleraine Town which are not suited to and cannot be accommodated in Coleraine Town Centre. This is vitally important in order that Coleraine Town is seen to outside investors as open for business in order that it can remain competitive in the face of other competing towns;
- Also request that the Council take a very cautious approach to the Nexus Report referred to in RT6, in terms of its findings that there is very little identified retail capacity over the plan's timeframe. Such capacity studies are generally a snapshot in time and rely on many assumptions and economic conditions that can change over time ; population growth, consumer habits and spending, retail sales densities, new retail formats, committed developments not being built etc. Nexus would appear to be aware of the anomalies in a retail capacity exercise in advising that "...notwithstanding our capacity projections, proposals for new retail floor space should still be assessed in line with the SPPS guidance on impact and need in the usual way. " (para. 1.29). Nexus are clearly inferring therefore that their findings on retail capacity should not prohibit future retail development in the Plan area but instead it should be assessed against the current retail policy framework. This approach is supported and it is requested that the Council assesses future retail proposals at Riverside based on the SPPS guidance in the usual way;

- It was envisaged in NAP 2016 that any future development at Riverside would complement rather than compete with town centres. The Plan acknowledged that Riverside accommodated a range of retailing commonly found in out of town centres, such as a DIY Store and a suite of retail warehouses selling predominately bulky goods;
- Unfortunately, over the intervening period and as a consequence of subsequent planning permissions the range of goods now directly competes with the town centre. This has without doubt increased vacancy and adversely affected vitality and vibrancy. Taking account of the range available I fail to see how Option 2 would be robust or implementable. I would urge that a third option is adopted, which takes forward the preferred option, but also includes a restriction on leisure or entertainment development at Riverside.

4.4.9 Retailing and Town Centres

Key Issue RT7: Filling Stations in the Countryside

Preferred Option (Option 1): Provide policy on acceptable location, size and function.



Summary of DfI's Response:

- Whilst further detail on the size of facilities likely to be deemed acceptable would be welcomed, this approach acknowledges the role and function of rural centres in line with paragraph 6.277 of the SPPS; and appears to be consistent with the aim, objectives and policy approach for town centres and retailing in that Filling Stations would meet the day-to-day needs of rural dwellers and be of a scale, nature and design appropriate to the character of the area in line with paragraph 6.278 of the SPPS.
- DfI Roads - Filling stations on the main road network - Department will be offering some consideration through the Guidance Document. This will be similar to IC15.
- Regional Planning & Policy Team: note and welcome Preferred Option 1.

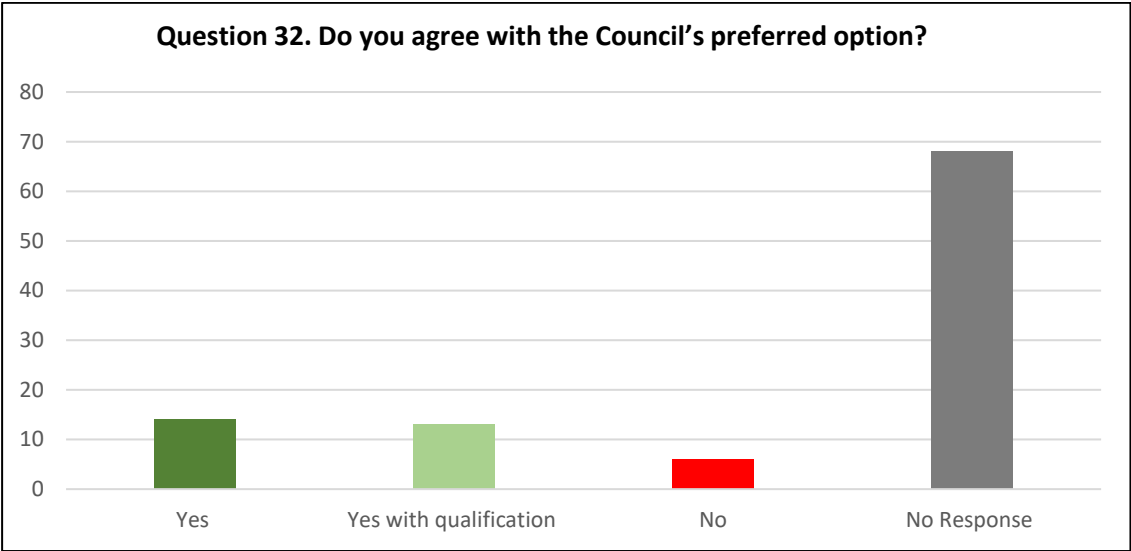
Summary of Other Responses:

- Less rate costs for business;
- Additional policy on the location of filling stations is not necessary/justified. Each application for a new service station could be assessed at an individual level, based on need and the proximity of other services in the vicinity. The Borough is already adequately served in this regard;
- Option 1 appears to support the existence of a known and stated policy in this area, which Option 2 does not;
- Small developments such as those associated with filling stations and other retail outlets are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss of ancient or long-established woodland. Given the prevalence of ancient and long-established woodlands in rural areas, they must be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence into the future;
- Issues, options and the two retail/business reports are noted. They do not cause particular issues for the Derry City and Strabane District area;
- In developing policy, it must be considered that the countryside (landscape) is intertwined with the historic environment and forms the immediate and wider rural setting of heritage assets. The historic environment and the setting of heritage assets often shares common pressures and strengths with landscape and countryside with regard to sensitivity to development within it;
- Is there an EU Directive on filling stations in the countryside which must be adhered to?
- Greater control and guidance is required;
- It is noteworthy that the SPPS is silent on Petrol Filling Stations (PFS) in the urban area. The only policies are contained within IC 15 – Roadside Service Facilities in the Planning Strategy for Rural Northern Ireland (PSRNI). It is not clear from the POP why filling stations in the countryside has been identified as a key issue;
- Retail NI would wholeheartedly agree that PFS's perform a necessary retail function, particularly in the countryside where they support the rural community and provide them with much needed services. They are supported by passing trade and therefore tend to be located close to key transport corridors or main road networks;
- The Council should consider a third option, which would apply a threshold of 250sqm of net retail floor space in the Countryside and that proposals above this must provide an assessment of need and a retail impact assessment. This would accord with the earlier approach at RT5 and would ensure control over the scale of the associated retail unit to prevent significant retail forecourts. This would achieve the same objective of protecting the vitality and viability of existing centres, without removing flexibility.

4.4.10 Tourism

Key Issue: TO1: Increasing Visitor Numbers - Impact on Our Sensitive Landscapes

Preferred Option (Option 2): Identify Tourism Conservation Zones (TCZs) and Tourism Opportunity Zones (TOZs) and develop policy for development within these areas.



Summary of Dfl's Response:

- Welcome the Council's "Tourism and Destination Management Strategy 2015-2020" and its vision.
- Accept that within the Borough there exists the "Traditional Tourist Hotspots" which attract large numbers of visitors and the "less well known" assets which the council would like to see promoted, each providing very different sets of circumstances and subsequent issues.
- The majority of "Traditional Tourist Hotspots" are within the countryside and/or highly protected areas. When formulating policy, the Council should look to strategic policy direction which states that for major tourism development in the countryside such proposals must demonstrate: exceptional benefit to the tourism industry; and sustainable benefit to the locality and that a countryside location is required by reason of its size or site specific or functional requirements.
- The planning system plays a pivotal role in managing tourism related development through bringing forward policies and identifying appropriate development opportunities whilst safeguarding tourism assets from harmful development. With this in mind, the Council's preferred option is welcomed which seeks to balance tourism growth through "Tourism opportunity Zones" (TOZs) and also protect the natural and historic environment through "Tourism Conservation Zones" (TCZs) where conservation interests are paramount. Without, however, the precise details of the location of these zones and the proposed policy to which they relate, it is difficult to appraise how successful the desired approach is likely to be.

- Council should be mindful of the overlap between the preferred approach under key issue TO1 and the selected option for the World Heritage Site under key issue WH1. The linkages between tourism and the Councils wider environmental, retail and the economic aspirations should be explored further when developing policy. Supportive of the Council's commitment to collaborative working with neighbouring Councils where tourism assets and their impacts spread geographically across council boundaries.
- DfI Roads - If rural locations are proposed as Tourism Opportunity Zones (TOZs) for large scale tourism or recreation schemes, careful consideration must be given to the existing infrastructure. Developers must be made aware that they may have to improve local infrastructure as part of any major project (roads, car parking, cycle tracks, footways, storm & foul drainage, etc.).
- TPMU: Paragraph 6.127 and 6.128 are noted. However it is not clear how the preferred option will address these issues.
- Regional Planning & Policy Team: Note preferred option 2. Consider further when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy. RDS Guidance RG4 is relevant.

Summary of Other Responses:

- In identifying TCZs and TOZs consideration must be given to existing land uses, particularly businesses, to ensure that their future development is not hindered by these protective policies;
- The sustainability of local heritage, built and natural, is important, but the current, largely uncontrolled boom in tourism at certain key points demands decisive action to contain and control traffic flows and the provision of easily-accessed parking areas;
- This approach is similar to the Preferred Option in MEA POP. The Causeway Coastal Route is identified as a common tourism asset for both councils and therefore important for a joined up approach to be advanced through both LDPs;
- Tourism development and providing access to important and sensitive sites as a tourist offering must be done with protection of the site/wider environment as a priority and must not result in the loss of landscape resilience, biodiversity, wildlife habitats or ecosystem services. Small developments such as those associated with tourism are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss of ancient or long-established woodland. Given the prevalence of ancient and long-established woodlands in rural areas, they must be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;
- GSNI works with a number of organisations to encourage and develop responsible tourism based on geological features. The Giant's Causeway and Causeway Coast World Heritage Site is one of only 2% of around 2000 WHS that have been designated for their geological heritage. There are significant visitor pressures at the site, and there are opportunities based on the wider area's considerable geological heritage that could be developed to reduce these significantly. Welcome establishment of Tourism

Conservation Zones and Opportunity Zones and encourage the Council to consult with GSNI on their establishment to maximise the growth of sustainable tourism which would, at the same time, protect the natural and historic environment;

- In accordance with RDS and SPPS, agree in principle with the general approach of identifying tourism conservation zones and tourism opportunity zones. However, as it is unclear at this stage as to how these zones would work in relation to the Giant's Causeway WHS Distinctive Landscape Setting and its policies, we reserve full judgement until we see such detail. Nevertheless, we support the need to protect our natural heritage tourism assets on which the Borough relies upon and the distribution of tourists across the Borough. An integrated approach should be applied across all the key attractions in the area, including for transport and services, with park and ride facilities (in conjunction with other Council areas) which enable visitors to travel easily (without relying on individual cars) from place to place while avoiding additional car parks/services at individual sites. These and other interventions are important to enable the Council and tourism providers to manage tourism in a sustainable way. We also wish to highlight the importance of protecting the WHS and its setting. Paragraph 6.6 of the SPPS states that development that would adversely affect the Outstanding Universal Value of a WHS or the integrity of the setting must not be permitted unless there are overriding exceptional circumstances. Local planning policy must adhere to this requirement
- The POP proposes Tourism Opportunity Zones and Conservation Zones similar to Derry and Strabane. It would be important for both councils to continue to co-ordinate our respective Tourism strategies to ensure that local efforts to help to secure the benefits of wider regional and national produce, marketing etc. The council welcomes the option of identifying areas which are seen as development opportunities relating to tourism where sustainable attractions and accommodation can be provided. We would also be supportive of the implementation of Tourism Conservation Zones (TCZ's) to protect those areas most vulnerable to the impact of development. Tourism development is important to the local and regional economy and the Sperrins are recognised as being a relatively undeveloped destination for tourists but there also has to be a balance between protecting our most sensitive landscapes and environmental assets and accommodating sustainable tourism development. The council would welcome the opportunity to work together to ensure that such designations are consistent across council boundaries;
- Initial concerns that the designation of Tourism Conservation Zones will introduce additional spatial control measures that will limit the potential for renewable energy development and particularly wind in the area. In the absence of the defined zones and associated policy, it is difficult to assess the implications of the designation and potential impact for renewable energy provision in the Borough;
- Sustainability of local heritage is important, but the current, largely uncontrolled 'boom' in tourism at certain points demands decisive action to contain and control traffic flows and provision of easily accessed parking areas. Greed must not spoil either the tourist experience or the integrity of the tourism asset itself;
- With reference to Para 6.126, in addition to the Marine Conservation Zones there are three marine Special Areas of Conservation (designated under the Habitats Directive),

which together with the MCZs are classified as Marine Protected Areas - the Skerries and Causeway Coast, Rathlin Island, and Red Bay (off Cushendun). The Rathlin Island Special Protected Area (designated under the Birds Directive) is also a MPA.

- Welcome the preferred option. Acknowledge concerns around the impact of inappropriate tourism infrastructure which diminishes authenticity and attraction of heritage assets. Important that historic environment evidence base is properly assessed to enable an understanding to aid the characterisation of potential Tourism Opportunity Zones. Welcome recognition of the part heritage plays in the area's vibrancy (justification text to preferred option – Dunluce Castle and the Giants Causeway area) - a unique historic and natural environment which is particularly dramatic along the coastline. Highlight how tourism can also financially benefit heritage assets by the reinvestment of a percentage of the money they generate into their conservation - opportunity to reinforce this reinvestment through policy. An opportunity has been missed by not including or developing options around other specific tourist heritage assets in the area. Are opportunities e.g. to develop options to protect, conserve and enhance the heritage associated with e.g. wealth of heritage within Bushmills town or the country estates/demesnes around Limavady, or to consider the group potential of the many coastal castles in the area. Highlight the importance of acknowledging and understanding that 'lesser' known heritage assets require protection too, e.g. local vernacular heritage assets, as these which suffer from inappropriate development pressures without the protection afforded through designation. Welcome the promotion of the historic environment and heritage assets as key tourism destinations. Exploiting the region's historic environment plays a decisive role in attracting outside investment. Highlight importance of maintaining and utilising heritage assets and their settings for sensitive approaches compliant with the SPPS, to maintain the district's distinctive historic environment character. Specifically highlight how areas of distinctive landscape and authentic heritage have been attractive to the film, and consequently tourist industries. This authenticity and sense of place is important to retain. Note: The historic environment and the setting of heritage assets often share common pressures with regard to sensitivity to tourist development, such as impacts directly on the asset, on its setting, removal of assets or impacts on below ground archaeological remains. In relation to bringing forward bespoke tailored policy: There is potential for policy consideration to include a heritage-led regeneration approach, or the inclusion of conservation plans to ensure a considered and sensitive design approaches are at the forefront in the decision making process, to enhance existing policies and consider statutory designations afforded to the historic assets and their setting. Disappointing that the "Study of the Economic Value of the Historic Environment" to the wider economy was not referenced in this section, report by RSM McClure Watters - link provided. While not a historic environment issue, there is a lack of reference to aqua cultural activities in the POP, including sailing and canoeing, particularly given the large coastal zone. Highlight importance of working with neighbouring councils and need for a heritage led approach to ensure continuity between districts so that the historic integrity of strategic heritage assets is not compromised;
- Historic environment is not limited to the obvious benefits such as recreational or tourism benefits. As it is reflected across all three strategic objections of Social,

Economic and Environmental – nurturing a living past is essential to health and *wellbeing, cultural identity, economic growth and sustainability through opportunities by promoting heritage-led regeneration;

- The POP identifies a number of tourist assets, such as the Giant’s Causeway, the Carrick-a-Rede Rope Bridge, the high quality rural landscape and the borough’s coastline. However, acknowledgment should also be given to the importance of high quality tourist accommodation and services, which not only enable tourists to visit and stay in the area, but can act as attracting factors in their own right;
- Sustainable transport modes and provision of coach parking should be provided at key attractors;
- Tourism is growing because of our heritage and our farmers, our towns and cities - no more restrictions are needed than those currently in place
- No specific tourism assets identified which should be exploited to take pressure away from traditional tourism hotspots (examples listed). Green tourism should be mentioned. Possible development of greenways, along with walking routes in the Sperrins. Activities listed including genealogical tourism, mountain biking;
- Approach is acceptable in principle. However, care needs to be taken to ensure policies protecting key assets does not unduly prejudice the ability to capitalise on the economic potential of such areas. Job creation through tourism development must be a priority for the Plan and Council, whereby economic considerations will be given a high priority in the assessment of projects. Planning permissions previously granted but not yet implemented for tourist related proposals should be afforded significant weight to their planning history;
- Particular concerns about how increasing visitor numbers will be managed to mitigate potential adverse impacts on the quality landscapes of the WHS and its Distinctive Landscape Setting and the AONBs within the Plan area. Tourism Opportunity Zones (TOZs) and Tourism Conservation Zones (TCZs) need to be carefully considered with particular attention being paid to the high sensitivity of these landscapes, the cumulative impacts of development and the monitoring and mitigation of adverse landscape and visual effects;
- Agree with Option 2. It will promote less well known or visited areas as additional tourism opportunities exist throughout the Borough, away from main tourism assets;
- Strongly opposed to the preferred option as it will be unduly restrictive to renewable energy developments. The introduction of a spatial approach with a series of landscape designations, protection zones, restricted heights and buffer zones as proposed, will serve to essentially sterilise any potential development opportunities in the Borough. Decisions on renewable projects should be made on a case by case basis. Any move towards a spatial approach must be evidence based and consistent. It is unclear how the proposed landscape character assessment will relate to the existing 2000 LCA series, or if there will be a co-ordinated approach with other councils. There is a need for regional direction/co-ordination on this matter;
- Should go further and include cognisance of environmental sensitivity. A well-thought out and workable mechanism for managing what is only likely to be increased pressure in the future should be put together. Could draw on the experiences of other areas in UK or further afield. Currently insufficient detail provided to ascertain exactly how

tourism will be sustainable and set within environment limits following the creation of Tourist Opportunity Zones. Species, habitats, landscapes and green spaces form a network of visitor attractions, which are of great importance to their local economies. Tourism in rural areas will often be related to the enjoyment of the natural environment, however, human activity can, in some instances, have a negative impact on biodiversity. Proposals should not have an adverse impact on biodiversity. Regard should also be had to the ecosystem services it provides. LDP must provide strong policy protection for those areas of natural and semi-natural habitat which lack formal designation and should also include those out with the protected site network. Vitally important that areas outside of any area of designation or constraint zoning must not become the 'sink holes' for development. Where the landscape is a core part of the tourism offering, all related tourism developments should be designed to be wholly sustainable and should not be at the expense of the area's natural assets. Issues of potential disturbance to key birds from recreational tourism should also be considered, e.g.: Lough Foyle designations of SPA/Ramsar/ASSI. Further details can be supplied for Rathlin and Lough Foyle to assist with the identification of sensitive areas from a habitat and species perspective. Green and blue infrastructure can play a crucial role in supporting healthy communities, supporting wildlife and mitigating the effects and causes of climate change, e.g. river corridors. Cognisance to environmental considerations should form part of the policy wording to include a demonstration that there is no detrimental impact on biodiversity or on sensitive environmental areas and features. Development that fails to respect the environment will ultimately erode the ecosystem services upon which the economy and society relies;

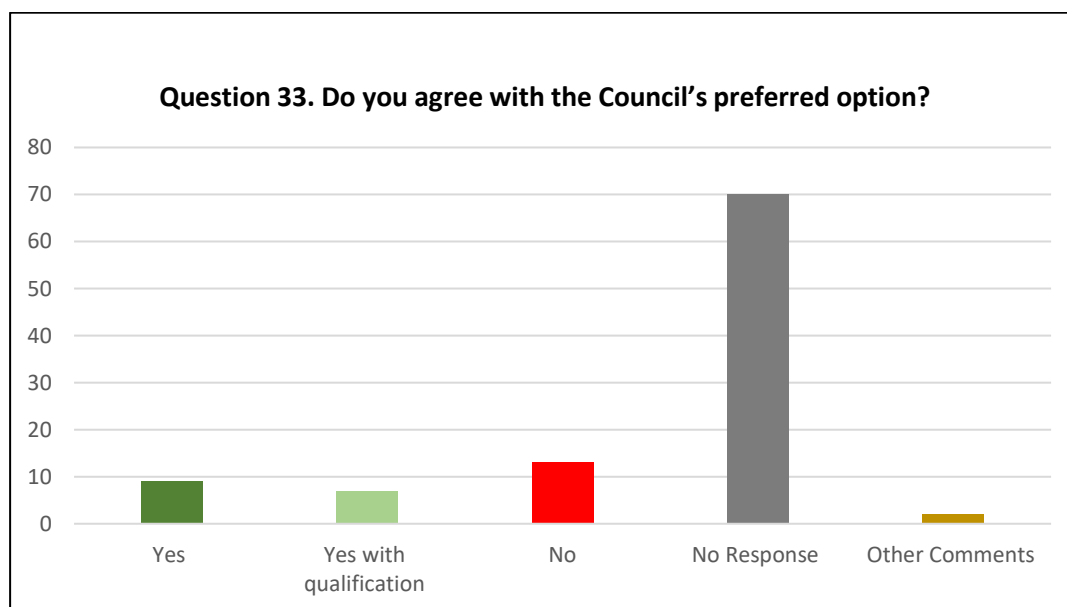
- The plan should support and create significant tourism destinations and increase focus in outdoor activities, culture, arts, live music scene and sports, which creates identity and vibrancy and gives people a purpose for travelling around and enjoying the hospitality in the Borough for longer;
- The promotion of events or annual festivals will attract tourists and world class activities, which enable the natural environment and tourist assets to be showcased. A diverse mix of activities will enhance the Borough for all as a responsible global tourist destination and encourage further growth of both local, regional and overseas visitors;
- Retail NI is supportive of the preferred option of developing TCZs and TOZs to strike a balance between tourism growth and protection of the tourist assets;
- The POP seems to imply that existing tourism assets will become "Tourism Conservation Zones (TCZs)" and less well known or visited areas will be Tourism Opportunity Zones (TOZs). It is not stated that everywhere outside of a TCZ will be deemed to be TOZ, or how TOZs will be designated. This should be clarified, but in any case, the boundaries of each TOZ will be difficult, if not impossible, to define. Tourist attractions may be small scale and not warrant inclusion within a TOZ. Individual attractions may be dispersed to the extent that grouping within a zoning is impractical. There is no need for this overly-prescriptive zoning-based approach to existing tourist assets. Similarly, new tourist assets that may come forward during the plan period will not have been identified at the plan preparation and adoption stages and might therefore fall a local plan-led planning test. This will curtail the development of tourism, particularly in rural areas that have potential but are currently under-utilised. Proposals for tourist development

should be assessed on a case by case basis, according to merit. The POP Policy Review should be clarified in relation to TSM6. The phrase, "restricting development on the seaward side of the coast." is confusing as the seaward side of the coast is presumably the sea, and Rathlin Island. Further policy restrictions regarding "proposed landscape designations" are also unnecessary and each proposal should be assessed on its merits. PPS16 emphasises careful siting and good design of new tourist development. These policies have generally been working well and should be carried forward in the new LDP.

4.4.11 Minerals

Key Issue: MN1: Promoting Sustainable Minerals Development – Buffer Zones

Preferred Option (Option 1): Define buffer zones around quarries to exclude inappropriate development.



Summary of DfI's Response:

- Acceptance that consideration will be given to the safety and amenity of occupants of developments in close proximity as advocated by the SPPS, and that the Council seeks to preclude inappropriate development within the vicinity of mineral workings. It is considered however, that buffer zone sizes will be dependent upon a number of factors, including type of mineral, nature of operations, and intervening topography. In the absence of details regarding sizes or if these will apply to existing or new operations only, the Department cannot comment further.
- Regional Planning & Policy Team: Note and welcome the preferred option 1.
 - In principle this option is consistent with the SPPS and the need for LDPs to safeguard mineral resources and ensure they are not sterilised by other surface development which would prejudice future exploitation.

- Consider further when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

- The Council's intention to safeguard existing quarries from inappropriate development is very much welcomed. We are keen to understand what area/setback distance might be considered appropriate and would be happy to directly engage with the Council on this issue. On this topic, we wish to highlight a significant error in Map 3 of the POP and Map Nos. 2 & 3 at Appendix 3 of Minerals Discussion Paper 9. Our Eden Quarry site at Glenshane Road is incorrectly shown as a ROMP site on Map 2 and it has been omitted as a "quarry" on Map 3. As the Council will be aware, permission was granted for a significant extension to this site (Ref. B/2005/0329/F) and this permission has been commenced. We respectfully suggest that the mapping which accompanies Discussion Paper 9 is out of date and needs to be reviewed/updated before any further works are carried out on the minerals section of the plan;
- Option 3 would seem to offer the greatest degree of flexibility here;
- MEA agree that quarries are spatially tied to their resources, which need safeguarded but given the lack of data confirming supply and demand for the various 'widely available' types of aggregates, it would be difficult to spatially annotate areas to be protected at this stage. MEA are however following this route in conjunction with DfE with regard to the Carrickfergus Salt mines as it is a regionally/nationally significant mineral;
- It is unclear how the buffer zones are to be drawn and what data will be used to inform them. This approach may have an unintended consequence of identifying buffer zones so tightly as to prevent exploration and mining activity in the future outside these zones. The Crown Estate awards commercial licences for the exploration and extraction of gold and silver deposits. The precise extent of area of deposits to be safeguarded is currently uncertain in the Sperrins and it may not be possible at this early stage to identify with any great precision the Protection Zone that should be applied. Future precision may not coincide with the LDP timeframe. The importance of the sites and sector to the economy is recognised, but the buffer zones should be drawn sufficiently wide and/or the policy reflect the need to retain flexibility to ensure the importance of such sites is properly recognised and not restricted or sterilised unduly in the future;
- Given the detrimental effects of mineral extraction developments on nearby communities, especially in terms of air and water quality, we believe balanced protections should be put in place for those rural communities as is being proposed for the minerals industry at the least. Question the Council's support of a minerals industry as it is by its very nature unsustainable: given the finite mineral resource and the damage and destruction caused to the environment through its operations. Again, ancient and long-established woodland must be afforded the highest level of protection given its biodiversity value and irreplaceable nature;
- The identified existing quarries shown on Map 3 (page 79) are outside settlement limits where development would have to be assessed against more restrictive rural policy. Some of the existing quarries fall within or close to sensitive landscapes e.g. Binevenagh

Area of Outstanding Natural Beauty (AONB), Causeway Coast AONB, Antrim Coast and Glens AONB and the Sperrins AONB. We disagree with Council's preferred option to identify expansion buffers around existing quarries outside settlement limits as rural planning policy would apply in any case. Instead we suggest that policy is set out to permit the extension of existing quarry sites subject to complying with a list of appropriate criteria that ensure any future proposal would not result in unacceptable adverse environmental, social and economic effects. Provision should also be made for the timely restoration and subsequent aftercare of the site. We agree with the preferred option to designate areas to be protected from mineral development which should include the distinctive setting of the Giant's Causeway and Causeway Coast WHS, the AONBs and along the north coastline including the beaches. This should equally apply to sand extraction and gravel extraction from beaches. Presumably these areas of constraint from mineral development will apply to peat? However, we disagree with identifying areas where mineral development will be acceptable. Such development should be assessed on a case by case basis to ensure there is no adverse impact on the landscape or environmental quality of designated areas;

- Both councils should continue to liaise to ensure appropriate levels of supply for the development of both our districts, balanced with appropriate environmental protection, particularly of our adjoining areas;
- Concerns regarding certain elements associated with the introduction of various landscape designations and buffer zones which might arguably result in an uncoordinated spatial approach and potential sterilisation of land for renewable energy development in particular windfarm development. This potential sterilisation of land could negate the ability of the council to support a diverse range of renewable energy development and development of a low carbon economy. In the absence of further information, it is difficult to review the implications of the plethora of designations. SPR favour a coordinated regional spatial approach to onshore wind energy development on a tested evidence base developed with a consistent approach across NI to be led by DfI; Welcome the Council's statement that a cautious approach should be taken to a wholesale exclusion of mineral development in designated areas. As mineral workings may cover other council areas, an appreciation of the approach undertaken by neighbouring councils is helpful. Refer to the Minerals Section of the Newry Mourne and Down POP. This is particularly relevant to the Sperrin AONB, and to the Antrim Coast and Glens AONB as quarries exist within or close to these areas;
- Minerals are a key local resource for the construction industry and this significance needs to be reflected in local planning policy. If they are not sourced locally, then they must be transported in from somewhere else, thus adding to their carbon footprint.
- Suggest clarity may be necessary to ensure that buffer zones do not automatically advocate that quarries can expand into them, as reflected in the justification text of MN1. Historic environment evidence bases will be critical in defining any buffered zones, along with key site requirements. Quarrying can be particularly difficult to accommodate without impact to historic rural environments. Evidence from excavations in relation to extensions to quarries across Northern Ireland indicates that extensions commonly lead to destruction (albeit by excavation) of previously unidentified below ground archaeological remains. Highlight that the reference in map 3 to Area of

Significant Archaeological Importance should be corrected to read Area of Significant Archaeological Interest as per correct policy wording. See response to Q34 for common related themes;

- Option 3 offers more protection to nearby residents;
- HSENI should also be consulted regarding developments within 100 metres of the boundary of the quarry (Information leaflet attached with submission);
- Support the preferred option of defining buffer zones around quarries per se. However, there should be a presumption in favour of sustainable development within these zones. The option as presented within the POP is too protectionist and given the contribution and the economic benefits that the industry provides both locally and regionally, the buffers should explicitly allow for the sustainable growth of existing sites;
- The proposed options as set out within the POP are not considered to be appropriately or properly evidenced at this stage, further up to date evidence is required to ensure that the plan can be made sound;
- The other options presented in relation to MN1 are not quantified and therefore, at present, there is insufficient information to comment on whether the approach would be suitable;
- It is contended that Option 1 does not go far enough, to promote and support the minerals industry. Whilst the option seeks to conserve valuable minerals, this only seeks to protect the resource against surface development which would either sterilise the mineral reserve or restrict its future extraction. Whilst buffer zones would exclude inappropriate development from the vicinity of quarries, the option would not be adequate in promoting the sustainable growth of sites;
- We would instead propose a presumption in favour of development within these buffer areas is included within the policy wording, where there would be a presumption in favour of sustainable minerals extraction or associated minerals development (e.g. processing, washing, screening);
- Whilst Option 2 does have the potential to safeguard the amenity of settlements, by taking such a blanket approach, it could result in the sterilisation of minerals. Each mineral working, like all development, will have differing characteristics and impacts. Therefore, defining a set distance which developments should be located away from settlements is unlikely to result in effectively tackling potential amenity issues which also potentially sterilising mineral. There are also the obvious questions around the extent of the distance between workings and settlement, the size of settlements, the type of minerals working. At present, there is insufficient information to comment on whether the approach would be suitable;
- Option 3 - developing buffer zones around mineral workings, without including a presumption in favour of development within such zones, would simply ensure the surrounding land would be safeguarded, however it is considered that this needs to be extended further to include a presumption in favour of development within these buffer areas. The option would be protectionist rather facilitating future growth. Our view is that this option does not go far enough to promote and support the continued supply of the essential resources;
- As above, at present, there is insufficient information to comment on whether the approach of defining the distance from a settlement would be suitable;

- There should be a presumption in favour of sustainable development within such zones, allowing for the sustainable expansion of existing sites and relieving development pressure elsewhere;
- Option 2 is preferred as farm and dwelling owners must be respected;
- Essential there is a balanced approach to sustainable minerals development;
- Sterilisation of buffer areas around common mineral extraction sites cannot be justified as there are numerous sources for such minerals;
- Concerns that designating buffer zones around existing quarries infers a presumption for their future expansion which could have adverse impacts on biodiversity and sensitive landscapes that are located within or adjacent to these buffer zones;
- Encouraged by the Council's intention to define buffer zones around quarries to exclude inappropriate development. It is noted that there can be conflict between mineral workings and other land uses as a result of the environmental impacts from mineral extraction and processing. When determining the extent of buffer zones the Council should engage with each quarry operator and GSNI and take the following elements into account:
 - type and nature of extraction;
 - extent of existing operations and future plans for expansion;
 - extent and location of the resource and capacity to expand operations;
 - DfE's GSNI toolkit;
 - ground suitability;
 - potential impacts on amenity (noise, vibration, and air); and
 - with an appropriate degree of flexibility to allow operations to adapt to changes in process.
- The new plan should also clearly define what is regarded as being 'inappropriate development'. This definition could be based on Policy MIN5 of the PSRNI and relate to any surface development which would sterilise or otherwise restrict the operations of a quarry/ mineral working. In addition, sensitive uses or receptors that would not be permitted within the buffer zone could also be identified, such as residential areas, hospitals and schools. The definition should also make it clear that other development, including industry, offices and some ancillary development related to the quarry/mineral workings, which are less sensitive to impact from mineral operations are acceptable in principle within the buffer zone, subject to normal planning considerations;
- Greater clarity is required to ensure that the proposed 'buffer areas' are not interpreted as being areas of deemed consent for mineral extraction. These areas should be subject to the rigours of the normal planning approval and environmental assessment process;
- With reference to the SA Matrices, the following comments are made: Key Issue MN1- The analysis of Option 1 concludes that there are no likely significant effects. It is unclear whether this policy applies to all quarries or to all active quarries or to 'some' quarries only. There is no 'qualifier' within the policy itself to suggest that quarries within or close to designated sites will have landscape or biodiversity features taken into consideration nor how 'amenity' would be taken into consideration unless this policy

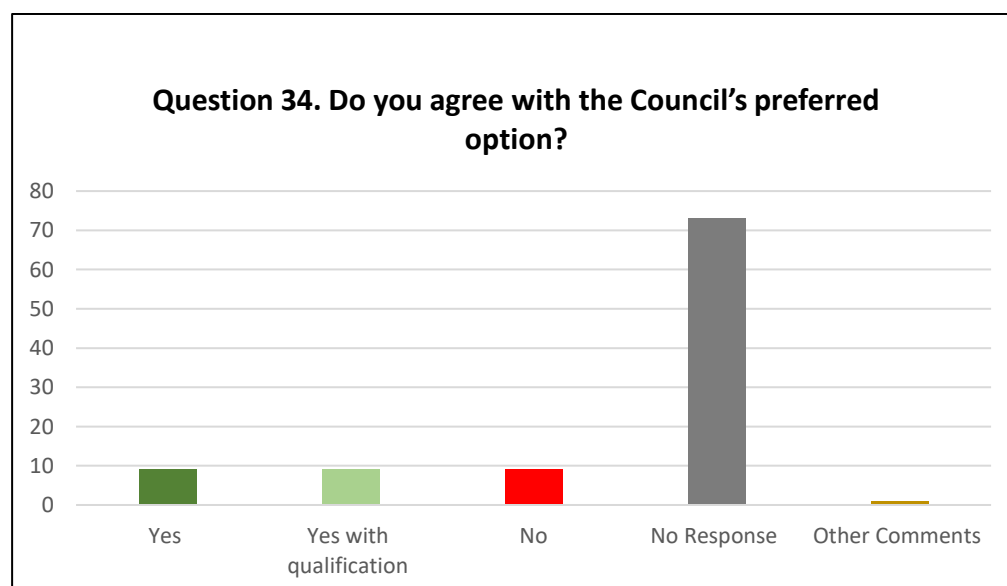
option MN1 is linked to MN2 in each instance. It is therefore not clear how the conclusion of no likely significant effects has been reached;

- Aggregates such as crushed stone and sand and gravel will be increasingly required across NI for the construction of housing and other infrastructure works. It is important to maintain a local source of minerals within the borough, to reduce transport costs and associated environmental impacts. Allowing scope for quarries to grow is essential. The mineral resource should be protected from inappropriate development that would limit or even prevent extraction in the short, medium or long term. Furthermore, welcome the cautious approach to the wholesale exclusion of minerals development in the designated areas listed (POP section 6.132). Many of these areas contain quarries or have quarries nearby. The GSNI Mineral Resources maps show a significant reserve that could be efficiently and sustainably extracted from these areas. Quarrying is less disruptive than in the past, particularly with modern controls on operating procedures which means less noise and dust. Well-established techniques for restoration can return quarries to agricultural or recreational use with high biodiversity value. The LDP could go further. Existing quarries in areas deemed suitable for mineral development quarries may have the greatest scope for expansion. These should have wider buffer zones, to prevent inappropriate development that would stymie this growth potential.

4.4.12 Minerals

Key Issue: MN2: Promoting Sustainable Minerals Development – Areas of Constraint on Minerals Development (ACMDs).

Preferred Option (Option 3): Designate areas to be protected from mineral development and define other areas elsewhere where mineral development will be acceptable in principle.



Summary of DfI's Response:

- The preferred option strikes a balance between the competing needs of mineral development and the protection of the environment as advocated by the SPPS.

However, the title of this option is misleading as it does not suggest that it also includes areas identified for minerals development. The Council should consider separating these two different approaches for ACMDs and areas acceptable for mineral development. Would welcome greater detail on whether the Council intends to propose mineral reserve areas or mineral safeguard areas.

- Information is not provided however as to whether the Council intends to review any existing designations under the extant plan.
- DfI Roads - Given the environmental impact and the need to improve infrastructure when dealing with mineral development, welcome the fact that areas are to be protected from mineral development. However, if other areas are to be identified where mineral development will be acceptable there is a need for a strategic approach across all Council areas.
- Regional Planning & Policy Team: note and welcome preferred option 3.

Summary of Other Responses:

- Again, this balanced approach which will identify both favourable areas and areas of constraint is very much welcomed;
- MEA agree with this approach although it should be noted that Larne Area Plan 2010 has an ACMD which abuts the CC&G BC boundary at our northern most part of the Antrim Coast and Glens AONB. MEA will be reviewing all ACMDs however we would welcome discussion on whether a cross boundary approach should be applied in this area of the Antrim Coast and Glens AONB;
- There may be situations where the ACMD areas coincide with sensitive landscapes such as AONB. Gold exploration has recently occurred in the Sperrin AONB in the Borough. Prefer a policy in the form of Option 2 based on the additional scrutiny of environmental effects within such areas may provide sufficient level of protection and balance in the consideration of such applications. An overly restrictive policy would have the potential to constrain the development of potentially valuable mineral resources. In addition to the purely physical considerations of mineral working, the policy should give sufficient weight to the significant economic benefits that arise from the working of mineral resources. As well as visual and other environmental effects, it is important to balance the very significant economic benefits to local communities and society at large that mineral working can deliver;
- Areas of ancient and long-established woodland should be protected from all and any development proposals. Given the biodiversity value and irreplaceable nature of the sites, as well as the vital heritage link they provide, they should not be offered up for short term financial gain. Ancient and long-established woodland must be included in the list identified for areas of constraint for minerals development. Given the Council's own findings that important growth sectors are food, tourism and culture, we would stress the need to consider the impact of the minerals industry on these growing and truly sustainable sectors. Also highlight the need to value correctly the ecosystem services and additional cumulative benefits provided for by environmentally sensitive and important sites - such as flood alleviation, air quality, water management, health and well-being, resilient landscapes to support agriculture sector and tourist offering.

The cost of the cumulative loss of these benefits in conjunction with the remediation costs associated with mineral extraction should be fully investigated before any approval for mineral development;

- Sustainable minerals development is a key challenge in the Sperrins AONB. MUDC welcome the concept of the ACMDs in that there is a requirement to maintain a balance between the environmental concerns associated with minerals development, alongside the acknowledged economic benefits of such development. MUDC also consider that development plans should seek to afford additional protection to our existing peat resources;
- The SPPS is clear in its instructions to Councils that they must identify areas (ACMDs) which should be protected from minerals development because of their intrinsic landscape, amenity, scientific or heritage value (including natural, built and archaeological heritage). However, where a designated area such as an AONB covers expansive tracts of land, the LDP should carefully consider the scope for some mineral development that avoids key sites and that would not unduly compromise the integrity of the area as a whole or threaten to undermine the rationale for the designation. As a responsible Industry body we recognise and appreciate this. However, are adamantly opposed to the current designated Areas of Mineral Constraint as we believe they are not based on an accurate balanced assessment taking into consideration economic and environmental aspects. In support of position, highlight EU Guidance on the management of Non Energy Extractive Operations within designated sites, and show how the needs of the extractive industry can be met while avoiding adverse effects on wildlife and nature, including many examples of best practice, and how biodiversity can be benefited. The EU adopted a Raw Materials Initiative in 2008 which sets out targeted measures to secure and improve access to raw materials. The EU Habitats and Bird Directives refer to the Natura 2000 network, which is Europe's rarest and most endangered species and habitat types. There is no automatic exclusion of NEEI activities in and around these sites, instead extractive activities should follow provisions to ensure they do not adversely affect the integrity of such sites (link to website provided). Contend that all extractive operations, regardless of location, be determined against a criteria based policy and if a proposal meets that criteria it will be acceptable. Highlight that most English mineral development in the Peak District National Park is in an AONB. Strongly argue against any policy that would introduce a prejudicial constraint on mineral development in AONBs;
- Minerals are a key local resource for the construction industry and this significance needs to be reflected in local planning policy. If they are not sourced locally, then they must be transported in from somewhere else, thus adding to their carbon footprint;
- Suggest that all the designations set out in para 6.131 are designated as areas to be protected from mineral development and from development associated with oil or gas extraction;
- Acknowledge preferred approach but would require clarity as to what criteria would be used in defining these. Provision of ACMDs would ensure alignment with SPPS to protect heritage assets from inappropriate mineral development. Any policy wording should ensure to take account of factors such as the historic environment and landscape character. Note, evidence from quarry related development indicates that there are

often destructive impacts on previously unidentified below ground archaeological remains. The location and settings of heritage assets, including archaeology (known and unknown) should be considered when identifying ACMDs. It is difficult for us to comment further with certainty on the preferred option without knowing, for example, where workings might be opened or reinstated and knowing how that might impact the historic environment. Highlight the importance of being able to demonstrate how historic environment evidence has been taken into account in informing assessment, land zoning and so on where there are proposals toward opening new or extending areas of quarrying. Need to consider key site requirements toward evaluation, identification and mitigation of impacts on previously unidentified below ground archaeological remains, where new extraction sites or extensions are proposed to existing quarries. Offers an opportunity within the LDP process to integrate sensitive adaptation measures in relation to the historic environment. Acknowledge that some quarries offer an important resource of natural stone used in historic buildings and monuments, which can be utilised in repair works to said structures. However, the volumes required here would be limited within the overall scale of quarry extraction – therefore, there is an opportunity to create specific policy around protection of historic quarries. Highlight that quarrying in the area of the Dunluce ASAI would not be appropriate. HED will shortly forward information on a further candidate ASAI at Banagher Glen;

- HSENI - consult regarding developments within 100 metres of boundary of a quarry (information leaflet attached with submission);
- Support the implementation of areas where mineral development will be considered acceptable in principle. The extents of such areas will need to be carefully considered, quantified and presented in collaboration with the Minerals Industry;
- Quantifiable evidence regarding the location and extents of such areas is required. A broad-brush approach whereby any designation for the protection of landscape or the environment is designated as an ACMD is not considered to be a sufficient strategy for designating areas. Existing mineral workings should not be included within such area;
- The proposed options as set out within the POP are not considered to be appropriately or properly evidenced at this stage, further up to date evidence is required to ensure that the plan can be made sound;
- Site at Murnee's has been operational since the mid 1970's. The area is therefore characterised by the operations and plant and structures associated with the businesses. Therefore, our view is that existing sites which have been operational for a significant period of time and that clearly characterise the local area should be afforded suitable policy protection which recognises their long-standing presence, and which allows for the sustainable growth of the businesses. Given the contribution that our client makes to the local and wider regional economy and the other environmental and social benefits associated with minerals development at Murnee's, we believe that the activities at the site should be adequately protected by specifically identifying the area in the emerging LDP and formulating policy wording which places a presumption in favour of development associated to mineral processing within such an area;

- The wording should allow for the sustainable expansion of established sites, therefore relieving pressure to develop elsewhere and focussing development associated with mineral processing and added value at existing, established sites;
- As the extent of such areas and the corresponding development management policy will require further clarification and evidence gathering before implementation, it is considered that the approach currently proposed by the Council is premature;
- The designation of all of these areas is not considered to provide an effective balance between economic and environmental effects and is unsound given the mineral evidence base currently held by the Council and therefore places too much emphasis on the protection of environmental designations, at the expense of the existing minerals industry sites;
- There is no attempt within the POP to explain why the areas identified above would be particularly sensitive to mineral development. For example, some landscapes will be sensitive to wind energy development but may be able to accommodate commercial forestry, others might be sensitive to permanent residential development, whilst able to accommodate well planned and designed mineral extraction;
- Furthermore, it is unclear as to why the information held has led the Council to specifically create ACMD's and why it has not equally been utilised to generate 'Areas of Wind Turbine Constraint' or 'Areas of Residential Development Constraint'. Put simply, we would ask why the only negative designation has been applied to minerals development and not used to create areas of constraint for a range of developments which have the potential to impact upon landscape, environmental, amenity, scientific or heritage value;
- At face value, this appears to be the regurgitation of a legacy policy approach that was challenged for the first time in the Magherafelt 2015 Area Plan and removed at the recommendation of the Planning Appeals Commission (PAC) who said "such an approach does not suggest that adequate consideration has been given to balancing economic and environmental considerations" (PAC January 2011 para 22.11). It was subsequently removed as an approach by the Department from any subsequent plans, as the basis for its imposition was proven to be unsound. The current approach does not appear to reflect the evidence-driven approach as envisaged in the SPPS;
- Murnee's – how are sites like this to be treated - in existence prior to the introduction of the possible ACMD/environmental designations. Careful consideration and evidence gathering required to ensure such sites are not unfairly restricted by the ACMD;
- Do not support Option 1 approach - would not allow any minerals development in areas designated for their landscape or environmental quality. The option is unnecessary and would place undue restrictions upon industry operators such as our client. The option would fail to achieve an effective balance between protecting the environment and facilitating economic development;
- Option 2 would allow for a case by case assessment of each mineral development proposal to ensure there is no adverse impact on the landscape or environmental quality of designated areas. Whilst the text which accompanies the alternative option states that the option would allow the minerals industry to operate sustainably, making best use of location and new technologies, in our experience, the case by case approach is often flawed;

- Our client considers that this approach has the potential to essentially be a consultee-led approach with intrinsic bias levelled at a consultee's 'area of concern'. In our experience, whilst under the control of the DOE, the wrong appropriation of weight was given to statutory consultee responses, with some responses given overriding weight over all other impacts;
- A planning application cannot be considered to have been decided on its merits where the input from one consultee holds overriding weight over all other material considerations including economic matters; particularly when it has been demonstrated that the proposal will not, if implemented, have a significant environmental impact. We would therefore urge severe caution in this regard;
- Support preferred option (Option 3) per se. Our client supports the designation of areas where mineral development would be acceptable in principle. The Council will need to take a clear, evidence-based approach to the implication of designating ACMD's. We would propose that our Client's site is afforded a presumption in favour of sustainable development through the appropriate wording of any future minerals policies. A policy which allows for the development at the existing site at Murnee's would allow the business to continue to grow, delivering economic and social benefits. The existing designations and other proposed policies within the LDP are considered to be more than adequate in ensuring the development at the site is maintained at suitable environmental standards. Development will already be restricted by the policies afforded to the AONB, which ensure its protection. The inclusion of the site within any ACMD would unduly restrict the operator and the future growth of the business;
- By ensuring that emerging policies within the LDP allow for the site's sustainable growth, it will provide the operator with the necessary confidence to grow sustainably, growing the local economy, creating local employment and helping to achieve the strategic objectives and vision for the LDP. Any future expansion plans would still be subject to an appropriate level of scrutiny at the planning application stage, however the change in policy would mean that there is no presumption against development at our client's existing, established location;
- In terms of the other options identified, our client does not support an approach which would unnecessarily prohibit any minerals development in areas designated for their landscape or environmental quality. The option is unnecessary and would place undue restrictions upon industry operators such as our client;
- In terms of designating areas to be protected from minerals development and areas where it will be acceptable in principle, our client broadly supports this approach, but further detail is required on where the areas are to be located and how their boundaries will be defined;
- Option 1 is preferred as mineral mining usually fills corporate pockets from outside of Northern Ireland;
- The WHS SG supports adoption of Option 3 on the understanding that the WHS and its Distinctive Setting are included in the plan as one of the most sensitive landscapes within the Borough;
- The process or mechanism of designating areas to be protected from mineral development while defining other areas elsewhere where mineral development will be acceptable in principle has not been explained in the paper. It is unclear if existing

designations will be treated equally or categorised into a hierarchy. Specifically, it is unknown if sites that are designated for geological reasons will be treated differently from other sites within Minerals policies;

- The coastal boundary for the LDP is the low-tide line. DAERA has issued a DRAFT Marine Plan for Northern Ireland for public consultation which confirms the marine planning boundary as the high tide line. It is essential that both plans are consistent in their policies for the same sites, landscapes and seascapes;
- While making an important contribution to the economy, minerals industry should be subject to appropriate constraints to ensure environmental sustainability and protection of the landscape;
- Welcome the Council's acknowledgement that a cautious approach should be taken to a wholesale exclusion of mineral development in areas that are the subject of environmental designation. Approach is consistent with the SPPS (Paragraph 6.155); The Council's preferred option is to designate areas that are to be protected from mineral development (ACMDs) and areas where mineral development will be acceptable in principle. This approach is welcomed where it gives certainty to the minerals industry and in respect of future quarrying operations at Cam Road, Thus, respectfully request the Council identify Cam Quarry as being in an area where mineral development is acceptable in principle and to safeguard from inappropriate development (maps provided);
- In terms of safeguarding minerals, it is important for the Council to recognise, when formulating a new policy that the extraction of minerals is dependent on the availability of sufficient land to provide for the processing and storage of materials and their distribution. This is the approach that is endorsed in England through the Planning Practice Guidance, which also provides helpful guidance for NI planning authorities;
- The POP does not identify any such areas that are to be designated, so unable to provide any specific comments at this stage. However, when designating such areas, the Council should ensure that it undertakes detailed landscape assessments to determine the extent of the ACMDs and that these assessments have cognisance of the existing position as well as the ability of the land to accommodate future quarrying and mineral extraction operations. Indeed, to comply with the SPPS, the extent of any ACMD should protect the areas of intrinsic value whilst recognising that the value of the wider area may not be consistent. Also welcome the reference to the Magherafelt Area Plan 2015 that is contained within Discussion Paper 9: Minerals. The Council should apply the approach adopted in the Magherafelt Area Plan post feedback;
- Consideration should also be given to including those species and habitats most at risk in terms of environmental impact, and not just include areas of High Scenic Value, e.g. Ramsar, SPA and ASSI designations. Further cognisance should be had to the fact that protected areas and sensitive landscapes (including species and habitats) do not sit in isolation from the surrounding area when identifying ACMDs. In this regard, it is essential to have regard to the direct and indirect effects of any linkages e.g. hydrological when considering such zonings. The POP has taken the SPPS, paragraph 6.156 further. Such a presumption could imply a weakening of the force of environmental policies. A plan-led system must be predicated on the ability of the

planning authorities, where necessary, to refuse development that sits outside that which is planned for, where it would not constitute sustainable development;

- With reference to the SA Matrices, the following comments are made: Key Issue MN2 This option allows the possibility of expansion of minerals development in designated areas. On page 207, 'likely significant positive effects are envisaged' for the preferred option. It is unclear how or why this conclusion has been reached;
- The Council's Discussion Paper on Minerals does not consider the options presented on Minerals within the POP and as such it is difficult to know how the options have been generated. Furthermore, the Discussion Paper acknowledges gaps in the evidence. Despite acknowledging the failings in the evidence the POP goes on to identify the Council's preferred approach. In the circumstances, this cannot be founded on a robust evidence base;
- It is essential for the Council to have regard to the considerations set out in the DfE's publication, entitled 'information on Minerals, Geothermal Energy, Groundwater and Geohazards to Inform LDP Preferred Options Papers'. This paper provides information on considerations that should be addressed by the Council. It also confirms that the approach of Planning Policy Wales is good practice. Chapter 14 (PPW) sets out that in order to monitor and review development plans, authorities should assess mineral resources in their area and their reserves for which planning permission exists. They should also assess the significance of the resources within their area;
- Welsh Local Development Plan Manual (Edition 2), August 2015 provides further useful guidance on what should be included within the first stage of the plan making process. It is Dalradian's view that without the above information there is no evidential base for the options derived. This evidence is an essential element of the test of soundness to be applied to the adoption of the Plan Strategy and Local Policies Plan. Once further information is available, it is likely to result in a requirement to reconsult on the new information as it could have an impact on the Council's preferred option;
- Dalradian welcomes the intention to apply a balanced approach through the designation of areas of constraint on mineral development (ACMDs) and areas where minerals development will be acceptable. The Council does not define the proposed location, although expressly recognising that the minerals can only be exploited where they are found in paragraph 6.130 of the POP. This fundamental principle is also reinforced in the SPPS;
- A more balanced, justifiable and robust approach would be to promote and facilitate a sustainable approach to minerals development as endorsed by the SPPS. The Council states that its preferred option would ensure the protection of the most sensitive landscapes, however that fails to take into account the countervailing principle that mineral extraction can only take place where it is found;
- The Council's preferred option includes the designation of ACMD's and whilst no detail is provided within the POP regarding the location of such designations the supporting information identifies that AONB's, like the Sperrins, are potentially suitable for such designations. We do welcome the Council's acknowledgement that caution should be taken in the application of a wholesale exclusion of mineral development in the areas of environmental designation and this approach is consistent with the SPPS. It is essential

that the Council undertake a detailed landscape assessment of the Sperrins AONB to inform what specific areas should be classified as ACMD's;

- It is critical that the exercise required by paragraph 6.155 of the SPPS is carried out in order to determine the extents of the ACMD's. The SPPS endorses and adopts the position taken in the Magherafelt Area Plan 2015 and is clear that consideration should be given to the protection of key sites within designated sites when considering the extent of an ACMD. In addition there needs to be an assessment of the economic value of the mineral resources within the Borough against the environmental considerations. At present the only evidence considered by the Council is a review of the landscape character areas defined within the NICLA 2000. This assessment is particularly important given that minerals are currently already extracted from within the AONB. This is acknowledged at paragraph 6.136 of the POP. Furthermore, paragraph 6.137 of the POP acknowledges the existence of gold resources in the AONB. In light of this knowledge, care should be taken to proposing a blanket ACMD across the AONB on the basis that it would not only prejudice the continued operation of these existing operations but also prevent other forms of sustainable mineral development;
- We would highlight that whilst proposing a restriction on mineral extraction within the proposed ACMD, other forms of development, such as agricultural and residential development will still be permitted within the AONB. It is worth noting that the accumulation of these forms of development will also have an impact on the intrinsic value of the AONB, however they will not be subjected to the same level of mitigation that is typically proposed for or required off mineral extraction activities;
- Mineral Reserve Areas (MRAs) - Dalradian supports the Council's proposal to include MRAs within the LDP. This is important in recognising the significant economic contribution that the mineral extraction industry does and will make to the local and regional economy. Dalradian welcomes the Council's acknowledgement, at paragraph 2.3 of Discussion Paper 9, of a gold resource in the district. The Council's POP also identifies the presence of gold within the Sperrins, with reference to exploration that has taken place. It is therefore of grave concern to Dalradian that the Council has no quantifiable data in relation to the mineral reserves in the District. Only limited mapping information provided by the British Geological Survey is included within the Minerals paper. There is no evidence that the necessary consultation with GSNI to secure the necessary information at a district level has been undertaken so as to inform the preparation of the POP and ensure the necessary understanding by the Council of the extent of quality of resource. It is our view that lack of detailed evidence to demonstrate an understanding of the extent of minerals in the district fundamentally undermines the preparation of the policy and the identification by the Council of its preferred option;
- Furthermore, whilst the Council has identified an intention to introduce MRAs neither the POP nor the evidence papers provide an indication of their likely location. This needs to be considered in advance of the preparation of the POP as it is required to inform the preferred policy approach. Secondly, in determining the extent of the proposed MRAs the Council should carry out consultation with those operating in the minerals extraction industry. We understand that this engagement has taken place to some degree but no evidence has been provided within the POP or the supporting documentation. Useful guidance in ensuring a sound and lawful approach is also

provided by Planning Practice Guidance, England. The failure to identify and understand the requirements of the sector before setting reserve areas represents a fundamentally flawed approach with a real risk of the Council looking as if it has predetermined the approach in the absence of evidence. Changes to the options presented in the POP may otherwise be required following the consultation and introduce new option/s at the next stage of the plan making process would not be in accordance with the consultation requirements;

For the Council to progress further with its planned strategy without a firm evidential base severely prejudices the entire process and its ability to formulate a sound and lawful local development plan. All elements of the preferred options have to be considered in taking the matter forward and the failure by the Council to collate the relevant data prevents this. It is therefore essential that this matter is urgently reconsidered and the following steps taken:- Appropriate information should be obtained from GSNI and other relevant parties/stakeholders as part of the statutory consultation process. Proper consideration of the options in respect of minerals development should then be carried out. Assessment of the appropriate information and options should be subject to further consideration and assessment as part of the SA process. A preferred option should be identified. A further consultation exercise should then take place.

- In formulating policy for the safeguarding of minerals it is important for the Council to recognise that the extraction of minerals is dependent upon the availability of sufficient land to provide for the processing and storage of materials and their distribution. This is the approach that is endorsed in England through the Planning Practice Guidance 9, which also provides helpful guidance for Northern Ireland planning authorities. “Planning authorities should safeguard existing, planned and potential storage, handling and transport sites to:
 - ensure that sites for these purposes are available should they be needed; and
 - prevent sensitive or inappropriate development that would conflict with the use of sites identified for these purposes.” This approach ensures that the operations to extract and distribute minerals can take place without impact on amenity as sufficient land is reserved in advance to provide the necessary buffer areas for development and ensure that no sensitive development is located near to mineral exploitation areas or processing areas. The Council’s mineral policy needs to recognise this important factor;
- Dalradian also supports the approach taken by the Welsh Government in relation to mineral safeguarding in NI - Planning Policy Wales (PPW) (Chapter 14). The Local Development Plan Manual (Edition 2), August 2015 also endorses that the LDP can safeguard minerals far beyond the plan period due to the need for long-term protection to prevent sterilisation by other forms of development;
Precious Minerals - Dalradian is concerned by the Council’s failure to include a specific policy relating to the exploitation of precious minerals despite their acknowledgement of the presence of gold within the Sperrins. Policy approach of MIN4 and MIN5 should be carried forward to ensure that the future extraction of valuable resources is not prejudiced. A failure to include specific policies on valuable minerals would result in a conflict with the SPPS which recognises the importance of planning for such resources.

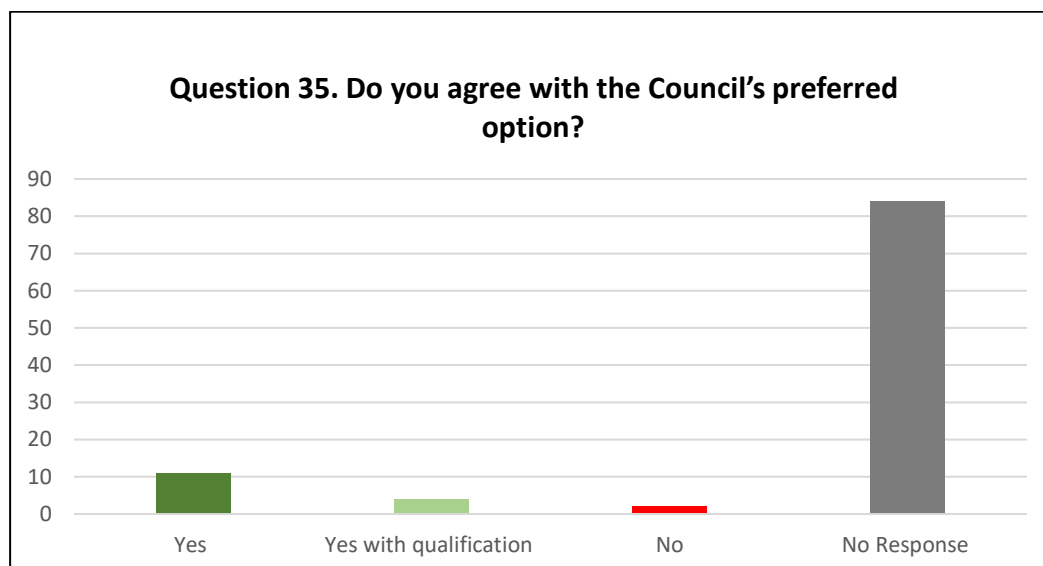
The Council should identify policy considerations for various forms of mineral development and in particular the extraction of valuable minerals (precious metals, base metals, EU critical metals and other elements) should be distinct from aggregates. This view is strengthened by the comments received from DfE in response to the Fermanagh and Omagh District Council's POP. The SPPS is clear that the extraction of valuable minerals in an AMCD should be treated as an exception as the SPPS clearly states that "there will not be a presumption against their exploitation in any area";

- Minerals must be extracted where they are located and much of the resources we will require to sustain the borough's economic growth is likely to be within potential ACMDs. Quarrying has changed in many ways since restrictive control policies such as ACMDs were formulated, rightly, to protect sensitive landscapes from degradation through mineral workings which were once simply abandoned and left as scars on the landscape. Today, careful design at the planning stage, environmental protection measures during phased extraction and restoration (conditioned at the outset) are standard for the industry. Blasting at hard rock quarries is more controlled and quieter than ever before. Greater consideration is given to after-use, and increasingly so at the earliest design stage. Older, worked-out quarries and gravel pits, which may be exempt from restoration conditions, can even be enhanced with new woodland, meadow and wetlands as part of planning conditions and agreements tied to new or extended workings. Quarries often contain trees, rock faces and ponds and can provide more biodiversity than surrounding farmland, even during the extraction phase. There should be a general presumption in favour of mineral development, sustainably implemented with a full restoration and after-use plan. We may have to look at extraction in more sensitive areas to find the minerals needed to support our economy, especially after Brexit. Rather than an arbitrary blanket ban in some areas, each mineral development proposal should be assessed on a case by case basis, on its merits. As noted in the LDP Discussion Paper 9, extraction of minerals within the ACMD may be acceptable where it "avoids key sites and that would not unduly compromise the integrity of the area as a whole" (SPPS 6.155 page 77). The SPPS also directs the council to identify areas that would be suitable for mineral development (where impact on amenity and sensitive environments would be less). An existing quarry such as Kilhoyle, Drumsurn (outside the Binevenagh and Sperrins AONBs) would presumably be one such area.

4.4.13 Minerals

Key Issue: MN3: Development in the Vicinity of Abandoned Mines, Adits and Shafts

Preferred Option (Option 2): Provide policy to restrict development on land known to be at risk of instability.



Summary of Dfl's Response:

- The extent of the area, to which the vicinity of restriction would apply, is not detailed. However, it is encouraging to see policy provision being brought forward to deal with this area.
- Regional Planning & Policy Team: note preferred option 2.

Summary of Other Responses:

- Caution and safety are paramount in this area. Areas where tunnelling, deep digging etc. has been known to have been carried out in the past should be re-assessed as to the level of hazard present;
- MEA would welcome discussion to clarify areas of potential subsidence that may cross the council boundary as we are proposing to assess and identify any other known areas of potential subsidence;
- There are 552 known abandoned mine workings in the Borough. The council should consider the various risks associated with abandoned mines, their deterioration over time and associated increase in risks. Development on land overlying abandoned mines should be avoided entirely wherever possible. Development proposals on land containing abandoned mines should include a Mine Risk Assessment and, if necessary, specialist investigation works to assess land suitability for development. Development within a 20m radius of mine shafts and adit entrances should not be permitted in the interest of public safety. Abandoned mines and infrastructure and artefacts are an

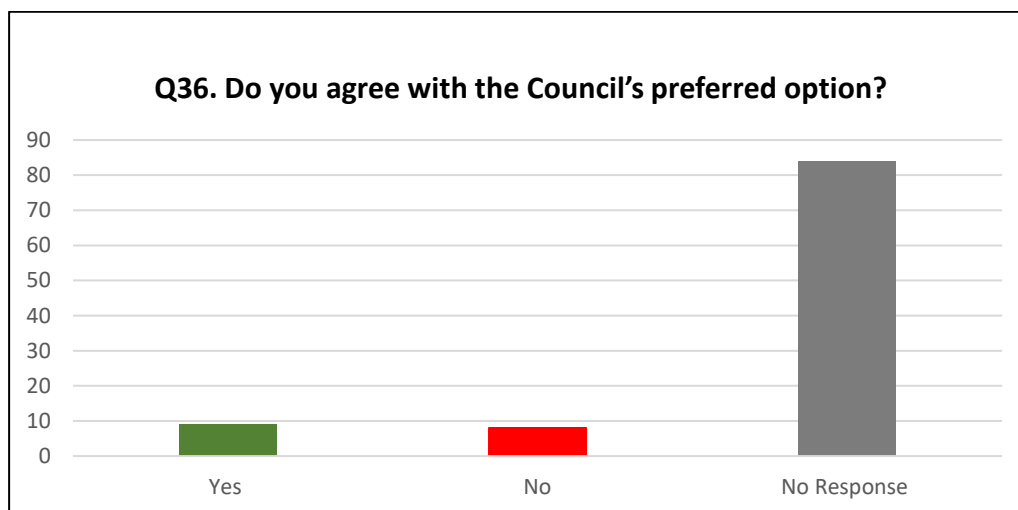
important historical and cultural resource and have potential to enhance and promote the heritage of the area;

- instability is a small issue in Northern Ireland, easily dealt with common-sense;
- There is also a biodiversity as well as historical and cultural value to these areas, with the potential for bat roosts to be present;
- The developer should demonstrate by survey, investigation, analysis, reporting, and remediation that sites are safe. There is little point condemning land because of historical use or activity;
- Retail NI supports the preferred option.

4.4.14 Minerals

Key Issue: MN4: Lignite Resources within the Borough

Preferred Option (Option 2): Retain the existing designation and amend existing policy framework to provide greater flexibility for development



Summary of DfI's Response:

- Council's Option 1 is more closely aligned to strategic policy direction set out at paragraph 6.155 (SPPS) in respect to minerals which specifies that local development plans should "safeguard mineral resources which are of economic or conservation value".
- However the Council's preferred approach (Option 2) will still retain the designation to safeguard the important reserve but also seeks to allow some flexibility on lands where development already exists. The Council should 'seek to ensure that workable mineral resources are not sterilised by other surface development which would prejudice future exploitation'. The evidence base should support any deviation from the regional policy approach.

- Regional Planning & Policy Team: Note and welcome preferred option 2. Further assessment will be carried out when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

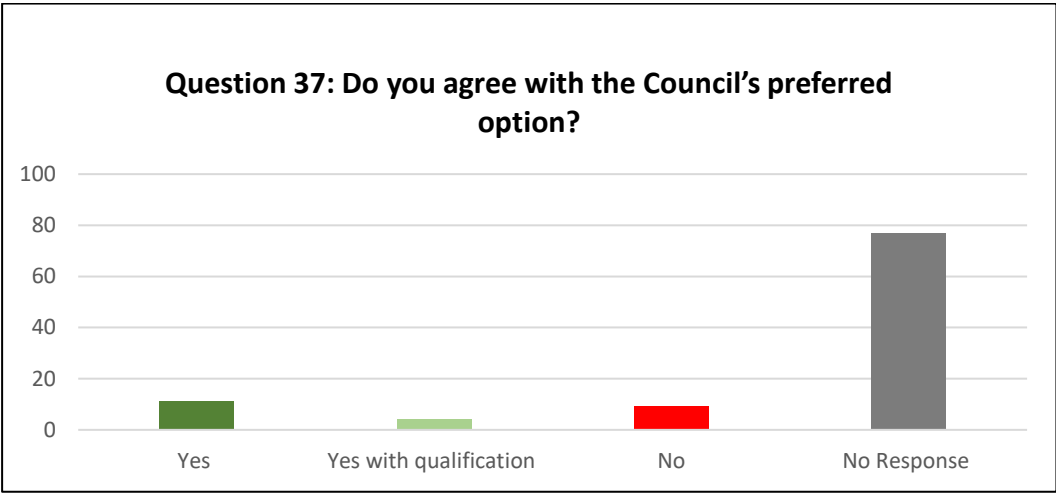
- Lignite, like other fossil fuels, is not a sustainable fuel source. Utilising this fuel would unnecessarily increase carbon emissions at a time when climate change related extreme weather events are having drastic effects on our agriculture sector and landscape resilience. According to investigations by Greenpeace, lignite is "among the most carbon intensive ways of generating power," one of the "dirtiest forms of fuel you can burn", and the open cast mining requirement can be disastrous for villages, streams and forests;
- Retention of the policy is welcomed. The 600mT deposit represents a significant potential resource for NI and protection against sterilization by surface development should be retained. The proposal to provide greater flexibility should be treated with caution. Local agendas and assumptions should not be permitted to override protection for what amounts to a regional resource. The proposal exposes the potential for development to slowly snowball unless clearly defined limits are established;
- The exploitation and use of lignite has been shown to be very dirty in environmental terms in the past. The control should be a tight one;
- Do not believe in protecting the so-called Lignite resource to enable future exploitation, because any activity associated with lignite cannot be described as sustainable. This is a fossil fuel, the burning of which would contribute significantly to greenhouse gases and to aerial pollution because of the impurities it contains. The actual mining of the Lignite would involve catastrophic damage to landscapes and perhaps of more concern, to our water courses and water table. The only remotely sustainable option with regard to Lignite is to forget about it;
- See response to Q34 for common related themes. The demonstrable use of historic environment evidence bases will be vital in informing the proposed approach;
- Lignite mining is no longer required nor will the people of Co Antrim allow it, renewable energy has ruled out any planning provision for lignite;
- Concerns regarding lignite mining in the area;
- As a sustainable Borough aiming to move away from carbon fuels, cannot entertain the thought of lignite consumption. Development should be restricted;
- Climate change is one of the most pressing challenges facing our society. With the appropriate policies in place, the planning system can help deliver the necessary changes needed for the country to meet its targets on reducing carbon emissions. NI should be concentrating on promoting low carbon renewable energy technologies;
- Retail NI supports the preferred option.

4.5 ENVIRONMENT OPTIONS & COMMENTS

4.5.1 Archaeology and Built Heritage

Key Issue: AB1: Safeguarding Our Non-Listed Heritage Assets

Preferred Option (Option 1): Provide policy to facilitate identification on a case by case basis



Summary of Dfl's Response:

- The retention of non-listed heritage buildings helps to maintain the distinct character and history of rural areas. The principle of the preferred option is noted, and discussion on how this policy might operate in practice would be welcomed.
- Regional Planning & Policy Team: The principle of the preferred option is noted and welcomed.

Summary of Other Responses:

- Option 2 would be preferred so at least a developer knows where they stand and where to avoid as it is a defined constraint;
- Option 2 provides for the prevention of the 'pull-down and take the flak afterwards' attitude of many developers, which has blighted the building heritage of in recent decades in this area;
- It is important that the identification of non-listed heritage assets be carried out by well-informed, highly skilled and properly resourced professionals. Concerned that the identification of non-listed heritage assets will depend on those individuals submitting a development application - if this is the case, there is a very real risk that without a pre-decision site visit by the aforementioned professional, that these important assets are not highlighted and identified for necessary protection. We believe it is vital that an up to date, fit for purpose and verified data baseline be established for all built and natural heritage assets before properly informed planning decisions can be taken;
- Identification of non-listed heritage assets on a case by case basis but wish to highlight the following points: The SPPS does not provide a definitive list of archaeology and built heritage assets. The plan should also highlight that Conservation Areas, Areas of

Townscape Character and Areas of Village Character are also built heritage assets. Paragraph 6.29 of the SPPS states that the local development plan should identify the main built and archaeological heritage features, where they exist within the plan area, and bring forward appropriate policies or proposals for their protection, conservation and enhancement. The Council should also take into account the implications of its other local policies and proposals on all features of the archaeological and built heritage and their settings. The POP is silent in relation to designating Areas of Significant Archaeological Interest (ASAI) whereas the SPPS highlights that the local development plan should designate such areas where appropriate. In accordance with the SPPS, local policies or proposals for the protection of the overall character and integrity of these distinctive areas should also be included in the local plan. The local plan should identify Historic Parks, Gardens and Demesnes (e.g. Downhill) along with their settings and bring forward local policies or proposals for the protection of the overall character and integrity of these distinctive areas as per the SPPS. The same applies to Conservation Areas (e.g. Cushendun);

- There needs to be ongoing co-operation and joint consideration of the key features and designations of our built environment, including awareness through our agreed joint mapping, of our adjoining environmental features. This includes marine planning/proposals. In particular, there has been ongoing liaison between the four adjoining councils of the Sperrin AONB and this needs to produce awareness and co-ordinated policy areas where appropriate;
- Query the purpose of this preferred option. There is an extensive DfI Historic Environment Division database on heritage assets. It is unclear what level of protection will be afforded to non-listed heritage assets through the development management process and what is the definition of non-listed heritage. There is already provision for protection of non-listed heritage assets (buildings) through PPS6;
- The Giant's Causeway and Causeway Coast World Heritage Site is designated for its natural heritage, and not for reasons of built or cultural heritage, or archaeology. It was included in PPS6 because guidance was 'borrowed' from GB, where almost all WHSs are designated for cultural heritage reasons, and this error has been perpetuated in spite of requests to correct it when the SPPS was being developed. This is an opportunity to correct the misconception, which believe should be taken;
- The description of the historic environment does not sufficiently demonstrate the Borough's historic character, or the vital contribution that it makes to the economy of the Borough and the region, through the film industry as well as tourism. Recognition of the Borough's unique historic environment qualities is crucial to a successful plan, and discussion on the ASAI, industrial heritage and maritime heritage is missing, e.g. the Borough presently contains NI's only two statutorily protected shipwrecks. Welcome reference to the Borough's connection with WWII and specific sites. Opportunity to bring bespoke tailored policies forward around this connection so that use of these sites can recognise their past in a heritage-led approach. Acknowledge the preferred option, but consider the creation a list of historic buildings of local importance as the preferred option for the historic environment would encourage and provide a more consistent approach to the identification and management of non-designated heritage assets across the district. The council should review 'Building on Tradition': A Sense of Loss

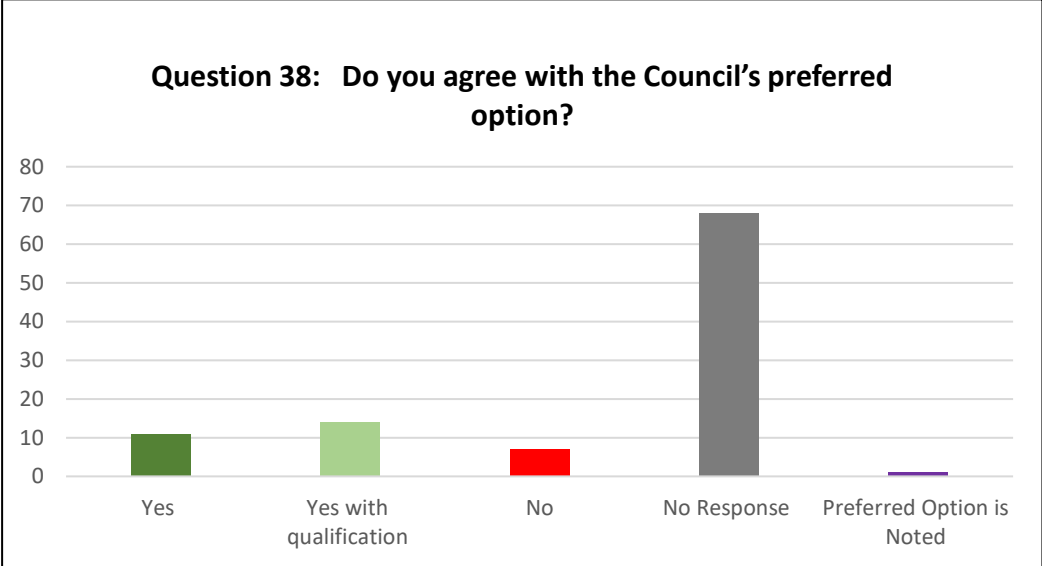
Survival of Rural Traditional Buildings in NI (published by the then Environment Heritage Service) which highlights the importance of rural vernacular architecture to distinctive character and giving local identity to NI and how through inappropriate planning policies, alongside other factors, many examples are being lost. The LDP affords council the opportunity to re-address this problem and welcome the discussion in the preferred option to afford further protection, while at this time acknowledging a local heritage list is not being recommended as the preferred option. The historic vernacular structures add to the character in urban and rural character setting, and provide and/or reinforce the distinctive character and local identity of an area – in line with RDS and SPPS strategic objectives. If not already part of the evidence base, the Council could monitor rural housing development, and query if a study has been carried out to review the percentage of replacement approvals in the Borough and the percentage of which may have involved the demolition of the district's non-designated vernacular structures. Loss of non-designated heritage assets can negatively impact the local identity and distinctive historic character of an area. Heritage assets in the countryside, including industrial heritage assets, vernacular and agricultural buildings, can make an important contribution to the rural housing stock through sustainable re-use rather than replacement. The Council could recreate stronger policy tests with regard to replacement dwellings, enable and enhance opportunities for non-designated heritage assets to be enhanced or preserved and/or consideration of the safeguarding of non-designated heritage assets – this would greatly assist in protecting the local, distinct heritage particular and unique to the Borough, e.g. stronger policy tests / evidence to indicate a structure is no longer structurally sound and/or remove the economic test (the argument that it is cheaper to build new). At PS and drafting policy stage, if a replacement dwelling option should be considered acceptable rather than its conversion or repair, consideration should be given for retention of the historic structure - to retain local identity, distinctive character and authentic places. Acknowledge such a policy would require careful consideration to ensure that such retained structures do not open a further 'replacement' opportunity at some future date. The importance of 'setting' of a heritage asset (designated or non-designated) must not be underestimated and the potential for negative impact from inappropriate development must be considered. The setting of a heritage asset is an essential part of its character and understanding. The term setting applies to anything in the physical space that is part of, has an impact on, or contributes to, the significance and distinctive character of a heritage asset, or through association with the site, and how the heritage asset may be understood, experienced or seen. Inappropriate development pressure can isolate them from their surroundings, degrade their setting and therefore, their historic and architectural character, context and understanding. Refer to the HED's guidance 'Guidance on Setting and the Historic Environment' for further information on setting, published February 2018, as part of the evidence base. NOTE: Emphasis in SPPS steers toward reuse of buildings in countryside (SPPS 6.24). Assume intention is to carry forward the existing policy suite in PPS6 with edits to wording to reflect the SPPS (as per Appendix 3). Recommend consultation with HED re content/need for SPG on The Control of Advertisements on a Listed Building. HED has flagged up linkages/differences between PPS 6 and the SPPS for future consideration in the preparation of the Plan Strategy;

- In Portstewart we have lost Rock Castle, 2 ice houses and a thatched cottage because they were not formally protected. When a developer identifies a development opportunity he all too often will not allow an unlisted building to stand in his way. It takes time to list a building and the developer will use that time to remove the obstacle;
- Strongly opposed to the preferred option as it will be unduly restrictive to renewable energy developments. The introduction of a spatial approach with a series of landscape designations, protection zones, restricted heights and buffer zones as proposed, will serve to essentially sterilise any potential development opportunities in the Borough. Decisions on renewable projects should be made on a case by case basis. Any move towards a spatial approach must be evidence based and consistent. It is unclear how the proposed landscape character assessment will relate to the existing 2000 LCA series, or if there will be a co-ordinated approach with other councils. There is a need for regional direction/co-ordination on this matter;
- The preferred option is not sufficiently ambitious. In furthering sustainable development and promoting an integrated approach to plan making, this key issue should be linked to urban design and place-making. Neither option has regard to protecting and enhancing the biodiversity that such buildings and places hold for wildlife in general. Good design can promote biodiversity and encourage wildlife, as per PPS 7. Urban biodiversity is declining, with 56% of the species surveyed for this habitat experiencing declines within the last fifty years (State of Nature report, 2016). The protection and enhancement of urban biodiversity can be achieved through careful planning and development, which aims to protect and enhance biodiversity on sites, and enhance connections between ecological features within and across sites. Old buildings can often provide safe refuges for our wildlife, as such any plans for regeneration/ refurbishment proposals should incorporate measures to continue to give nature a home. Clarification is also sought on where the expertise for assessment on a case by case basis will be sought, e.g employed or consulted experts?

4.5.2 Natural Heritage

Key Issue: NH1: Protection of Our Most Sensitive Landscapes and Seascapes

Preferred Option (Option 2): Retain the principle of the existing policy framework and designate our most sensitive areas as Special Countryside Areas (SCAs) and provide policy to protect these areas



Summary of DfI's Response:

- No planning policy differentiation between areas of high landscape quality and areas where no such designations exist, and the preferred option to provide stricter policy to protect the most sensitive areas is welcomed. Noted that the Council has gathered information on landscape character and further work has to be undertaken in relation to this issue. Council should ensure that emerging policy is backed up by a robust evidence base.
- Regional Planning & Policy Team: Note and welcome the principle of the preferred option in respect to designating Special Countryside Areas and the provision of policy to protect these areas.

Summary of Other Responses:

- It would be good to have an option that recognises an allowance for offshore renewables and their electrical connections at the shore;
- Consideration of existing activities/land uses should be included within the protective policies;
- Our sensitive land- and seascapes have frequently been abandoned to suffer at the hands of unscrupulous exploiters. NI is way behind e.g. the Republic and European countries in its failure to ensure the sustainability and protection of e.g. our AONBs;
- Within Mid and East Antrim, the coastal area north of Larne town has a Special Countryside Area (SCA) designation which abuts our shared council boundary. Our Council's preferred option for Key Issue 29: The Southern Glens Coast was to retain this

existing SCA designation and accommodate spatial and policy amendments to the designation if considered appropriate. Important for a joined up approach to be adopted through both LDPs;

- The Lower Bann corridor should not be designated as an SCA. Current policy should allow for sufficient protection of important and sensitive landscapes;
- It is vital that the Council and the planning department recognise that not all sensitive or important landscapes are designated. Ancient and long-established woodlands are irreplaceable but are undesignated as a habitat classification - this does not mean they do not warrant protection from development. Compensation/mitigation planting are not appropriate or acceptable in such cases. Broadly support the preferred option but ask that this woodland be given the highest level of protection from development given its biodiversity value, irreplaceable nature, many and varied ecosystem services, heritage links, support in landscape resilience and its scarcity. Important to note that some designated sites are in unfavourable condition. This is proof that designation alone does not equal adequate protection for the site. Some sites require restoration works and wider policy protection to ensure their continuance in to the future;
- Fully support the designation of Special Countryside Areas (SCAs) in general. Also support the general approach to apply stricter policies to AONBs. Whilst the SPPS states that 'appropriate weight' must be given to designated sites of national importance, the local plan should go further and state that 'great weight' should be given to conserving landscape and scenic beauty of AONBs which have the highest status of protection in relation to landscape and scenic beauty. Robust policies should be applied to conserve and enhance the AONBs. The policy tests should include considerations of landscape sensitivity, intervisibility between the AONB, seascape and landscape beyond, interdependency between the special qualities of the landscape and the marine and coastal environment, and the need to sustain and enhance the significance of heritage assets, including any contribution made by their setting etc;
- It is acknowledged that individual councils will develop their own policies to address issues whilst ensuring they do not conflict with the policies of neighbouring councils;
- There needs to be ongoing co-operation and joint consideration of the key features and designations of our natural environment, including awareness through our agreed joint mapping, of our adjoining environmental features. This includes marine planning/proposals. In particular, there has been ongoing liaison between the four adjoining councils of the Sperrin AONB and this needs to produce awareness and co-ordinated policy areas where appropriate;
- Queries the rationale for introducing an additional layer of spatial protection in the landscape in the form of Special Countryside Areas. In the absence of detail on the geographical location of the SCAs and the associated policy, it is difficult to review the potential implications for renewable energy provision. The rationale for this potential departure from the SPPS has not been adequately justified;
- Our sensitive landscapes and seascapes have been left to suffer at the hands of unscrupulous exploiters. NI is way behind the Republic of Ireland and Europe in its failure to ensure the sustainability and protection of our AONBs;
- Through quality restoration, mineral sites can enhance biodiversity in the local area;

- This would provide a much needed level of protection to the most important landscapes in the area which previous policies have failed to deliver in the past;
- Welcome intention to carry out a Landscape Character Assessment. Welcome the preferred option. Seek evidence of how the historic environment has been considered with the sensitive land/seascapes - should be key to any policy. Sensitive landscapes are inseparable from the historic environment and the landscape forms the immediate and wider rural setting of heritage assets such as vernacular buildings, historic boundaries and ancient burial cairns. The historic environment and the setting of heritage assets often shares common pressures and strengths with landscape and countryside with regard to sensitivity to development, and conversely, providing important habitats and biodiversity. Field boundaries, which play an important biodiversity role, are critical to the landscape character of the area, and their layout has often been influenced by natural, historic and topographical characteristic, e.g. historic settlement patterns. Townland, Parish and field boundaries are of particular importance and merit protection through the planning process. Evidence of how the historic environment has been considered in context with the natural environment should be key to any policy determination. Unable to provide further detailed comment as unsure as to how the sensitive upland landscape zones would be defined. Would welcome clear consideration of heritage assets in the definition of these. Important that the zonings do not infer that impacts will be acceptable in other locations;
- It would be hoped that the banks of the Bann would be protected;
- There are many agricultural and industrial sheds in the countryside. Many of these are faced in bright white metal and are visible from a long distance. We would request that the Council could apply a condition to planning approval for such developments. The condition would be that industrial or agricultural sheds should be faced in green to mitigate against the impact on the rural countryside. We would especially emphasise that this should be the case in AONB or countryside which has landscape character;
- The majority of the WHS SG members support adoption of Option 2. The WHS is situated within the Causeway Coast AONB. It is understood that if the WHS and Causeway Coast AONB are designated a SCA this will afford greater protection to the Distinctive Setting and Wider Setting of the WHS than is proposed in Key Issue WH1 (Question 48). The current WHS Management Plan considers the WHS setting in three categories; the Distinctive Landscape, Supportive Landscape and Connective Landscape, reflecting the zones that were included in the DRAFT Northern Area Plan (NAP). The adopted NAP recognised only the Distinctive Landscape Setting. Moving to designate Special Countryside Areas may result in the WHS setting being viewed more in line with previous understandings. The SG encourages CCGBC and its planning team to view, consider and understand the contribution of all these settings in retaining the Outstanding Universal Value of the WHS during development of Option 2;
- Crucial in order to protect natural heritage;
- Support the principle of identifying our most sensitive landscape and seascape areas as SCAs, but concerns that it serves to break down AONB designations, suggesting that some areas are of less importance than others where development is potentially more acceptable. The policy wording needs to be strong enough to guard against this. This may be addressed in part by NH2 and other landscape designations;

- No clarity is given to whether AONBs will be wholly considered as SCAs or whether an exercise to select areas within these will be conducted. Understood that the suggestion of providing stricter policy for areas designated as SCAs could potentially increase protection for AONBs;
- Strongly opposed to the preferred option as it will be unduly restrictive to renewable energy developments. The introduction of a spatial approach with a series of landscape designations, protection zones, restricted heights and buffer zones as proposed, will serve to essentially sterilise any potential development opportunities in the Borough. Decisions on renewable projects should be made on a case by case basis. Any move towards a spatial approach must be evidence based and consistent. It is unclear how the proposed landscape character assessment will relate to the existing 2000 LCA series, or if there will be a co-ordinated approach with other councils. There is a need for regional direction/co-ordination on this matter;
- Lacks ambition in furthering the conservation of biodiversity, which is a duty on all councils, but the POP remains silent on this. Background narrative should accompany Map 2 for reference to the designations' feature species and habitats. Consideration could also be given to including Forest Service sites, and important Bird Areas. To halt the loss of our habitats and species, the council will need to 'work(ing) towards the restoration of and halting the loss of biodiversity' as per paragraph 3.33 of the SPPS. The importance of ecosystem services has not been addressed in the POP, and as such it remains silent on how it will seek to address, protect and enhance ecosystem services. This is of great concern. Development that fails to respect the environment will ultimately erode the ecosystem services upon which the economy and society relies. The SPPS recognises that 'the careful management, maintenance and enhancement of ecosystem services are therefore an integral part of sustainable development'. The condition of ecosystem services, the provision of services and their relationship to human well-being should be integrated into plan-making and decision-taking processes as set out in the SPPS through the LDP objectives. These short-comings must be addressed in any future iteration of the LDP. Full cognisance must also be given to the natural environment and its biodiversity out with designated sites as only a very small proportion of our biodiversity relates to such sites. The RDS, Sustainable Development Strategy for NI and other policy, guidance e.g. NI Biodiversity Strategy 2020 must be taken into account. The SPPS states a precautionary approach should be taken in relation to significant risks of damage to the environment. Other requirements of the SPPS re natural heritage, biodiversity, landscape etc are listed. The LDP policy on natural heritage should include restoration and enhancement in a manner that reflects the Lawton principles and its review regarding restoration of ecological networks. The potential for the planning system to deliver biodiversity enhancement is not being realised, e.g. through positive policies and supplementary guidance (DEFRA survey quoted). This would add value to the provision, enhancement and connection of open space and habitats in and around settlements. Any natural heritage strategy should accurately reflect the RDS, SPPS, PPSs and guidance documents, with no weakening or dilution. Development that fails to respect the environment will ultimately erode the ecosystem services which the economy and society relies upon and this needs greater recognition in the LDP. There is no indication of the Council's preferred approach re

international, national and local nature conservation designations (designated out with the LDP process). This will require a cross boundary integrated approach. Buffer zones around designated sites should be considered to provide a hinterland to buffer the protected area and provide space for nature to expand at a landscape scale. PPS 2 provisions should be carried forward in full. Sites of local designation, including SLNCIs, must be afforded protection. PPS 2 provisions should be carried forward in full. Any potential delisting of a SLNCI should examine the reasons for the loss in quality and put measures in place as part of the LDP to aid its recovery. Full cognisance must be given to the natural environment and its biodiversity out with designated sites. PPS 2, policies NH 2 and 5 remain crucially important in achieving sustainable development. NH5 should be carried forward as this is weakened in the SPPS. The LDP should provide a list of habitats, species or features, as per the SPPS, and an indication of where these may be found where possible. Reference should be given to the value of ecosystem services. Similarly, there should be no policy weakening of PPS 2 re protected species, or AONBs. re SCAs, it will be important that areas outside must not become sink holes for development, the potential environmental impacts of any development or constraint zoning must be thoroughly assessed in the decision making process. The LDP must clearly spell out what SCAs mean and how they will be managed. They should be areas where the council can demonstrate how a sustainable economy can be built around nature, and require precise spatial expression. Should include, e.g the ASSI/SPA/Ramsar designation at Lough Foyle and Garron Plateau into the wider hinterland to buffer the protected areas and provide space for nature to expand at a landscape scale. There is merit in identifying sensitive landscapes and seascapes at a regional scale, to include designated and non-designated sites, in providing a spatial expression for renewable energy production, especially wind. LLPAs should be identified, retained, enhanced for their importance to biodiversity and ecological networks. They could assist the council in promoting the design of ecological networks to help reduce the fragmentation and isolation of natural habitats. The POP is silent on the identification and protection of urban and rural landscape wedges which have value as important wildlife corridors, which could assist in promoting the design of ecological networks. An illustrative list of Special Places is provided that should be protected from development, managed appropriately and enhanced, e.g Lough Foyle, coastal areas, River Roe and woodlands. In addition, there are other areas with potential to hold and/or do more for nature conservation that the council may have access to/influence, e.g parklands, golf courses, gardens, trees and hedges, SuDS and quarries;

- There is no need to designate SCAs over and above existing and well-understood designations such as AONBs. Appropriate development has the potential to enhance the natural environment through active investment in restoration measures and ongoing management. A lack of development can lead to neglect and degradation of the landscape that the policy intends to protect. Each development proposal should be treated on its merits in terms of siting and design;
- The landowner would agree that the most sensitive land and seascapes should be protected insofar as possible from inappropriate development and apply a more thorough examination of development proposals in the AONBs so that demonstrable harm is not caused to their setting. A number of LLPAs on the peripheries of Kilrea

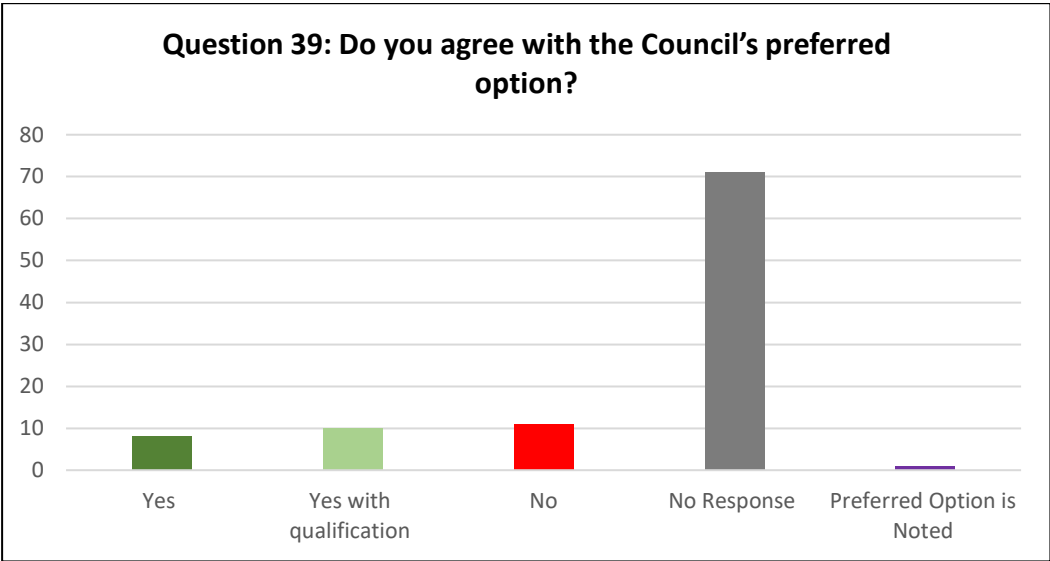
appear to be designated because of their natural means of enclosure, screening, biodiversity and urban setting values they provide for the town. In accordance with Key Issue NH1 the more sensitive landscapes and seascapes should be protected insofar as possible, however this should not preclude appropriate development opportunities where these can be carried out in a sensitive and sympathetic manner. With regards to LLPAs which exist at a more local level, appropriate development can be accommodated where this is carried out in a harmonious manner and does not compromise the nature of the designation. The particulars of LLPA designation KAL 03 - Washing Lough include the lough and the Manor Golf Club and associated grounds. It is contended that in light of the strategic policies proposed by the POP that opportunity exists within LLPAs to allow appropriate development where this would enable the protection and retention of the LLPA designation. Washing Lough LLPA currently provides recreation and leisure amenity for many of the surrounding residents and beyond. The integrity of this LLPA would not be undermined or compromised if the site is included within the settlement limits for Kilrea with appropriate development opportunities to ensue. Enabling development within the site will ensure that the remainder of the land continues as a valuable wildlife corridor and habitat and outdoor sports and leisure facility;

- Agree that the most sensitive land and seascapes should be protected insofar as possible from inappropriate development and apply a more thorough examination of proposals in AONBs so that demonstrable harm is not caused to their setting. The existing LLPAs in the NAP around Kilrea appear to have been designated due to their natural means of enclosure, screening, biodiversity and urban setting values they provide for the town. This should not preclude appropriate development opportunities where these can be carried out in a sensitive and sympathetic manner. In LLPAs, appropriate development can be accommodated where this is carried out in a harmonious manner and does not compromise the nature of the designation;
- Agree that the most sensitive land and seascapes should be protected insofar as possible from inappropriate development and apply a more thorough examination of proposals in AONBs so that demonstrable harm is not caused to their setting. The land and seascape attract a lot of tourism which facilitates local jobs and contribution to the local economy. Policy should ensure that it accommodates appropriate development proposals where a definite need is demonstrated to sustain this industry and heritage;
- Agree that the most sensitive land and seascapes should be protected insofar as possible from inappropriate development and apply a more thorough examination of proposals in AONBs so that demonstrable harm is not caused to their setting. The existing LLPAs in the NAP around Garvagh appear to have been designated due to their natural means of enclosure, screening, biodiversity and urban setting values and should be retained as much as possible.

4.5.3 Natural Heritage

Key Issue: NH2: Protection of Our AONBs

Preferred Option (Option 3): Provide policy based on the identified landscape quality of each AONB



Summary of Dfl's Response:

- Welcome the Council's intention to liaise with other Councils as appropriate regarding the relevant planning policy in two of the AONBs that have cross Council boundaries. Also note the intention to provide policy, within the parameters of the SPPS, based on the identified landscape qualities of each AONB. It is noted that the Council has gathered information on landscape character and development pressure in the Borough and that further work is to be carried out in this regard.
- Assumption that the full range of measures to protect landscape, such as LLPAs and landscape wedges etc., will be explored by the Council in moving forward.
- Regional Planning & Policy Team: Preferred option is noted and welcomed. Of particular note is that 2 AONBs within the plan area lie in part within neighbouring council boundaries. Stress the importance of joint working arrangements with neighbouring councils in this regard to ensure consistent local policy development.

Summary of Other Responses:

- Option 2 would be preferred as it defines the constraint and lets developers know what is possible and what isn't, rather than case by case basis. It would accelerate the pre-construction stage of a project. However, again consideration of existing activities/land uses should be included within the protective policies. It is widely acknowledged that minerals may only be worked where they are found. By its nature, the surface geology which forms our most scenic landscapes ensures that minerals deposits are most workable within these locations. On the mainland UK, a significant proportion of its quarrying operations are located within AONBs and National Parks. This demonstrates

that extractive industries can operate within these sensitive locations without reducing the landscape values for which those areas were designated;

- Our sensitive land- and seascapes have frequently been abandoned to suffer at the hands of unscrupulous exploiters. NI is way behind e.g. the Republic and European countries in its failure to ensure the sustainability and protection of e.g. our AONBs;
- The Antrim Coast and Glens AONB crosses our shared council boundary. Our Council's preferred option for Key Issue 33: the Antrim Coast and Glens Area of Outstanding Natural Beauty (AONB) was to provide increased policy protection to protect exceptional landscapes and areas considered highly sensitive to particular types of development within the AONB. We would welcome discussion on whether a common policy approach should be applied in the shared boundary area of the Antrim Coast and Glens AONB;
- Not all designated sites are in favourable condition. Concerned that the protection policy for AONBs, if based solely on the current 'landscape quality' will not provide for the necessary protections, restoration works and on-going maintenance plans for the site. Each AONB should be reviewed to ascertain its current and potential quality, with restoration and management plans bridging that gap;
- Support the general approach to apply stricter policies to AONBs. Whilst the SPPS states that 'appropriate weight' must be given to designated sites of national importance, the local plan should go further and state that 'great weight' should be given to conserving landscape and scenic beauty of AONBs which have the highest status of protection in relation to landscape and scenic beauty. Robust policies should be applied to conserve and enhance the AONBs. The policy tests should include considerations of landscape sensitivity, intervisibility between the AONB, seascape and landscape beyond, interdependency between the special qualities of the landscape and the marine and coastal environment, and the need to sustain and enhance the significance of heritage assets, including any contribution made by their setting etc;
- It is acknowledged that individual councils will develop their own policies to address issues whilst ensuring they do not conflict with the policies of neighbouring councils;
- There needs to be ongoing co-operation and joint consideration of the key features and designations of our natural environment, including awareness through our agreed joint mapping, of our adjoining environmental features. This includes marine planning/proposals. In particular, there has been ongoing liaison between the four adjoining councils of the Sperrin AONB and this needs to produce awareness and co-ordinated policy areas where appropriate;
- The council is supportive of the protection of our sensitive landscapes and environmental assets and in particular the integrity of the Sperrin AONB designation. It notes the option in relation to the Sperrins AONB is through the application of stricter policy control;
- Query the rationale for introducing the requirement for additional spatial protection for AONBs further to existing policy. How will this additional landscape policy protection be coordinated with adjoining councils, and relate to existing policy provision on AONBs? Advocates the development of regional policy for onshore renewable energy development, in particular wind, evidence base, coordinated across NI;

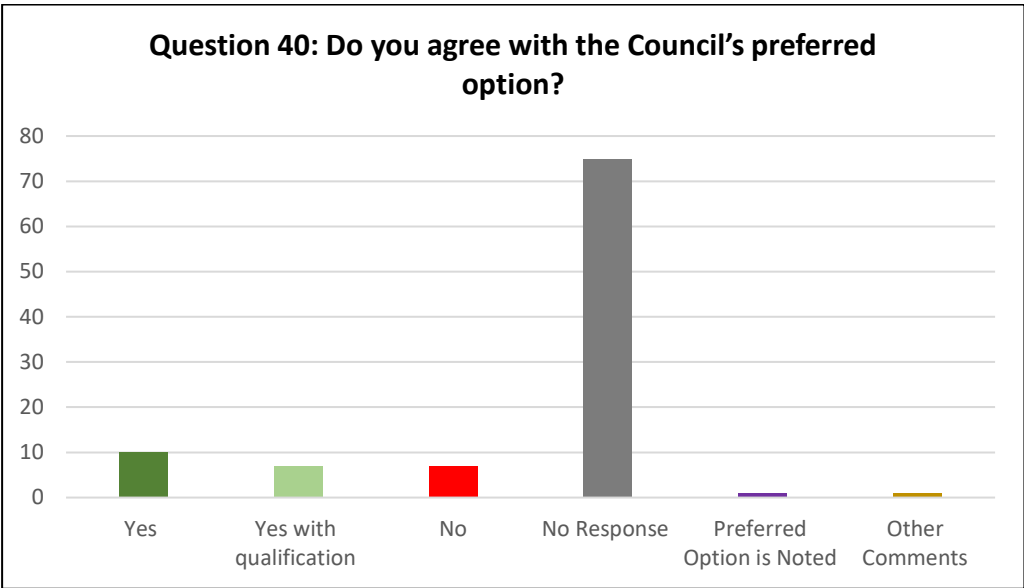
- The SPPS is clear in its instructions to Councils that they must identify ACMDs which should be protected from minerals development because of their intrinsic landscape, amenity, scientific or heritage value (including natural, built and archaeological heritage). However, where a designated area such as an AONB covers expansive tracts of land, the LDP should carefully consider the scope for some mineral development that avoids key sites and that would not unduly compromise the integrity of the area as a whole or threaten to undermine the rationale for the designation. As a responsible Industry body we recognise and appreciate this. However, we are adamantly opposed to the current designated ACMD as we believe they are not based on an accurate balanced assessment taking into consideration economic and environmental aspects. In support of our position, we highlight EU Guidance on the management of Non Energy Extractive Operations within designated sites, and show how the needs of the extractive industry can be met while avoiding adverse effects on wildlife and nature, including many examples of best practice, and how biodiversity can be benefited. The EU adopted a Raw Materials Initiative in 2008 which sets out targeted measures to secure and improve access to raw materials. The EU Habitats and Bird Directives refer to the Natura 2000 network, which is Europe's rarest and most endangered species and habitat types. There is no automatic exclusion of NEEI activities in and around these sites, instead extractive activities should follow provisions to ensure they do not adversely affect the integrity of such sites. Link to website provided. We contend that all extractive operations, regardless of location, be determined against a criteria based policy and if a proposal meets that criteria it will be acceptable. Highlight that most English mineral development in the Peak District National Park is in an AONB. Strongly argue against any policy that would introduce a prejudicial constraint on mineral development in AONBs;
- Our AONBs have not received the protection they require, which has seriously devalued the designation. It should be noted that AONBs in England and Wales qualify as IUCN Protected Areas as considered under the Convention on Biological Diversity, but those in NI have not been recognised as such. As a result we have failed to reach the Aichi target for the % of land area that is protected. Measures such as this might make a difference to the appraisal of our AONBs;
- Welcome the preferred option. Opportunity of policies for each AONB to recognise their particular historic landscape characteristics, heritage assets and potential vulnerabilities to their integrity;
- Serious and detailed consideration must be given to the effectiveness of introducing more restrictive rural planning policies in AONBs, In order for there to be a meaningful shift from rural to urban house building the rural annual build rate, constant at around 270 dwellings per annum 20 years, would need to be reduced by at least half to meaningfully tilt housing development towards settlements;
- There are many agricultural and industrial sheds in the countryside. Many of these are faced in bright white metal and are visible from a long distance. We would request that the Council could apply a condition to planning approval for such developments. The condition would be that industrial or agricultural sheds should be faced in green to mitigate against the impact on the rural countryside. We would especially emphasise that this should be the case in AONB or countryside which has landscape character;

- Remember who owns and looks after the majority of the land in the countryside. Sufficient protection is now in place;
- The WHS SG supports the adoption of Option 3. In line with the response given to Key Issue NH1 Option 3 will afford greater protection to the WHS and its Distinctive Setting than is proposed through Key Issue WH1. The SG is supportive of the suggestion to use LCAs as a basis to develop AONB specific policy however the SG recommend that: The LCAs should be subject to expert review before they are used to develop policy. Seascape Character Areas - DAERA should be considered essential in this process as the WHS is a coastal site. The intangible assets of AONBs should be given consideration. It was agreed that no AONB specific policy should create a hierarchy of AONBs in the CCGBC area. Binevenagh and Coastal Lowlands Landscape Partnership in partnership with NIEA and CCGBC Planning is undertaking to review LCA in the Binevenagh AONB area 2018/2010;
- Welcome strong policies specific to each AONB based on Landscape Character Assessment. However do not wish adverse effect on AONB residents;
- Option 1 preferable. No evidence that AONBs have suffered as a consequence of current policies;
- Welcome the option to apply policies specific to each of the 4nr. AONBs which would be stricter than those currently applicable to the open countryside;
- No need for additional protection - aware of protection in planning applications and happy to continue;
- Strongly opposed to the preferred option as it will be unduly restrictive to renewable energy developments. The introduction of a spatial approach with a series of landscape designations, protection zones, restricted heights and buffer zones as proposed, will serve to essentially sterilise any potential development opportunities in the Borough. Decisions on renewable projects should be made on a case by case basis. Any move towards a spatial approach must be evidence based and consistent. It is unclear how the proposed landscape character assessment will relate to the existing 2000 LCA series, or if there will be a co-ordinated approach with other councils. There is a need for regional direction/co-ordination on this matter;
- An AONB designation is more than how a landscape looks. Rather, such areas are designated primarily for their landscape quality, wildlife importance and rich cultural and architectural heritage. The POP has failed to have regard to heritage and wildlife and concentrates on the visual quality. In seeking to protect such areas from inappropriate development, the use of spatial policy areas for the most sensitive parts (including species and habitats) including, e.g. the designation of a SCA or an Area of Constraint (and the wider hinterland buffer) could be used to control wind turbines. This is not about creating individual policy bespoke to each AONB, but applying spatial policy areas as layers over the holistic AONB designation;
- There is no need for more restrictive policies within the AONBs. Appropriate development has the potential to enhance the AONBs through encouraging public access and enjoyment of the area. This can lead to a better appreciation of the value of the AONB and the wider landscape generally. Further arbitrary restrictions across the designated areas will result in increased pressure and degradation of the remaining, non-designated countryside. Each proposal should be treated on its merits.

4.5.4 Development in the Countryside

Key Issue: CY1: Dwellings on Farms

Preferred Option (Option 1): Retain the principle of the existing policy framework



Summary of Dfl's Response:

- Welcome the Council's preferred approach to retain the principle of the existing policy framework as set out in the SPPS. Council is reminded that policies and proposals must reflect the aims, objectives and policy approach of the SPPS. However there is flexibility for councils to bring forward policies to address local issues. Policies should be realistic and set within the prevailing policy framework of the RDS and SPPS. Evidence should be presented to justify any departure from the policy approach set out in the SPPS.
- TMPU: Could/should consideration be given to the location of sites? i.e. those in close proximity to rural Public Transport Routes.
- Regional Planning & Policy Team: Note and welcome the preferred option. Consider further when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

- Once every 10 years is too high a frequency, it should be linked to once a generation and not be allowed to be sold outside of the farm holding unless the whole farm is sold with it;
- Option 2 would allow greater flexibility for farm diversification towards tourism and recreational development opportunities along the Bann corridor;
- Broadly support the preferred option given the development pressure already being exerted in the countryside. Suggest that proposed mitigation measures be included in planning conditions to reduce unnecessary environmental damage associated with development. Small developments such as those associated with housing are clearly

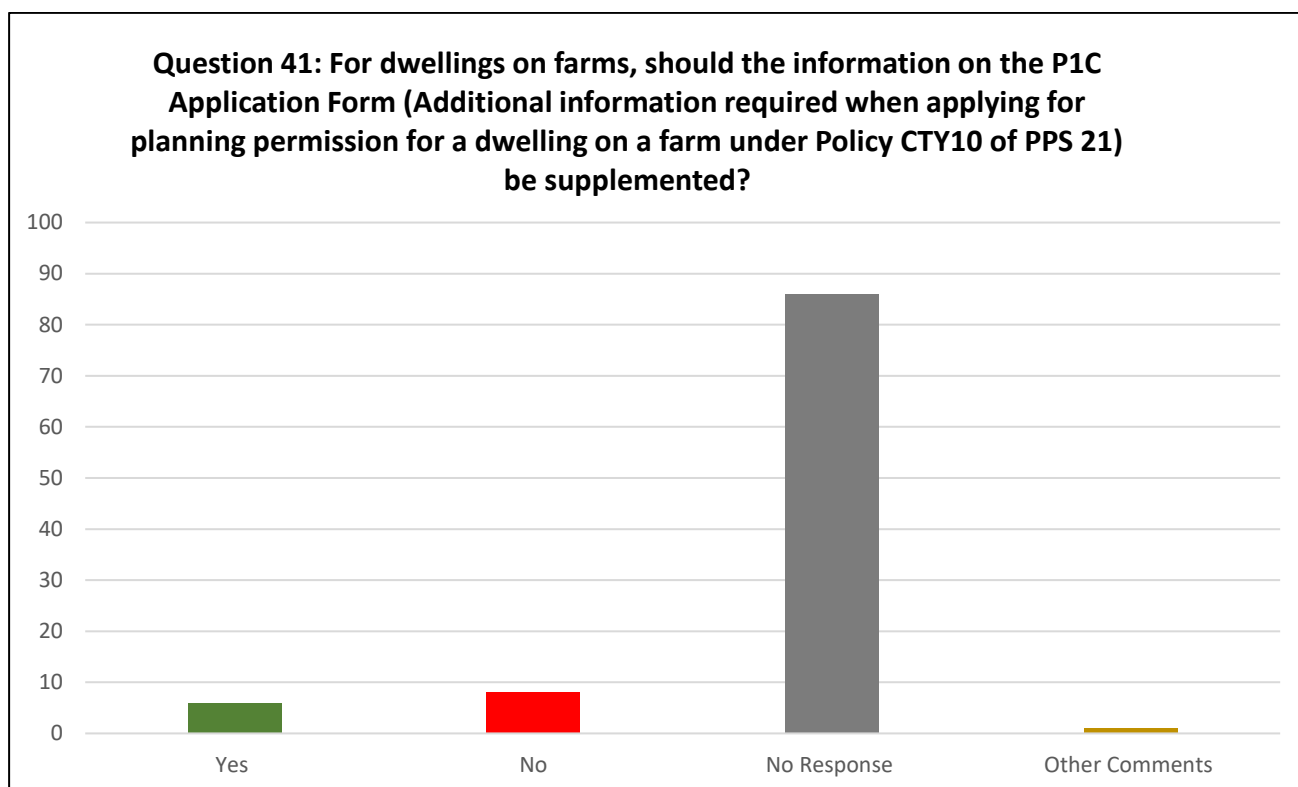
not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss of ancient or long-established woodland. Given the prevalence of ancient and long-established woodlands in rural areas, they must be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;

- We recognise that one house every ten years on a farm is currently set out in the SPPS as well as the broad approach of clustering and consolidating development outside settlement limits. However, the local plan should ensure it provides a higher protection to sensitive rural landscapes, such as, AONBs. Green belt designations should at least be considered as a mechanism to prevent urban sprawl;
- Your preferred options to facilitate sustainable development in the countryside, simplify the policies and to provide additional opportunities for houses on farms, rural social housing, buildings' re-use and also rural economic development are noted, these are broadly in line with the policy direction that Derry and Strabane is currently working towards in its emerging LDP Plan Strategy;
- Our neighbours in the ROI have allowed indiscriminate growth in the past decades with disastrous results to many formerly desirable landscapes;
- This policy is too restrictive and should not be continued. We need to allow farms to retain more of the family members on the land to ensure rural communities do not become aged and isolated. Rural communities will quite often develop their own facilities etc which then do not cost the rate payer. If bins etc are already being collected on a road then what is the increased costs to collect a few more. Future policy must better reflect the current demographic of the Council's population;
- Believe that local social, community, cultural, heritage and historical considerations mean there should be a more relaxed policy in terms of housing in the countryside;
- The policy needs to be adhered to more closely;
- Opportunity for the Council to recreate stronger policy tests with regard to the re-use (or replacement) of dwellings and structures including industrial heritage assets, vernacular and (appropriate) agricultural buildings to enable and enhance opportunities for both designated and non-designated heritage assets to be protected, conserved and enhanced. If replacement should be considered acceptable rather than a re-use, conversion or repair, consideration should be given for retention of the historic structure - to enable the local identity, distinctive character and authentic places to remain. Acknowledge that such a policy would require careful consideration to ensure that such retained structures do not open a further 'replacement' opportunity at some future date. NOTE: Emphasis in SPPS steers toward reuse of buildings in countryside (SPPS 6.24). Opportunity to create a more positive heritage-led approach for the historic environment by highlighting the particular need to re-use rural vernacular buildings to maintain them - retaining a sense of local identity and distinctive character to an area. Is further opportunity for policy consideration to: Address Permitted Development on agricultural businesses (e.g. the erection of new agricultural sheds without the need to apply for planning permission) as this policy gap can be problematic regarding agricultural buildings and their impact on the setting of heritage assets;

Ensure a robust evidence criteria is set in place for applications which state vacant buildings cannot be re-used due to structural concerns and economic bases (too expensive to up-grade/repair) justify new builds. The council should seek evidence to demonstrate that alternative options for re-use and repair have been considered and exhausted. Reports must provide recommendations for conservation or stabilisation options in the first instance. Highlight potential concern if 'health and safety' and/or 'the ability to secure funding' (item 6.178) was included into policy as may become misinterpreted to unbalance policy weight in their favour;

- The number of true NI farmers who maintain the countryside and keep it looking the way it is are disappearing at a rate of close 5% per year. FFA and other farm organisations are battling for change on farm incomes, the last thing we will accept is any potential young farmer or their parents being deprived of a house to live in on the farm they own and work;
- Clusters of houses need to be screened by natural landscaping as they can detract from natural beauty of landscape. Policy should encourage replacing derelict houses and barns in the countryside;
- POP appears largely silent on other development in the countryside i.e. infill, clusters, conversions etc;
- Additional thought given to vital protection of existing rural buildings. Too many have been lost due to planning policies of replacement opportunity, with insistence that the existing structures should be demolished;
- With reference to the SA Matrices, Key issue CY1 - Possible measures to reduce negative effects and promote positive effects may be achieved through Key site requirements.

Development in the Countryside



Summary of DfI's Response:

- No Response

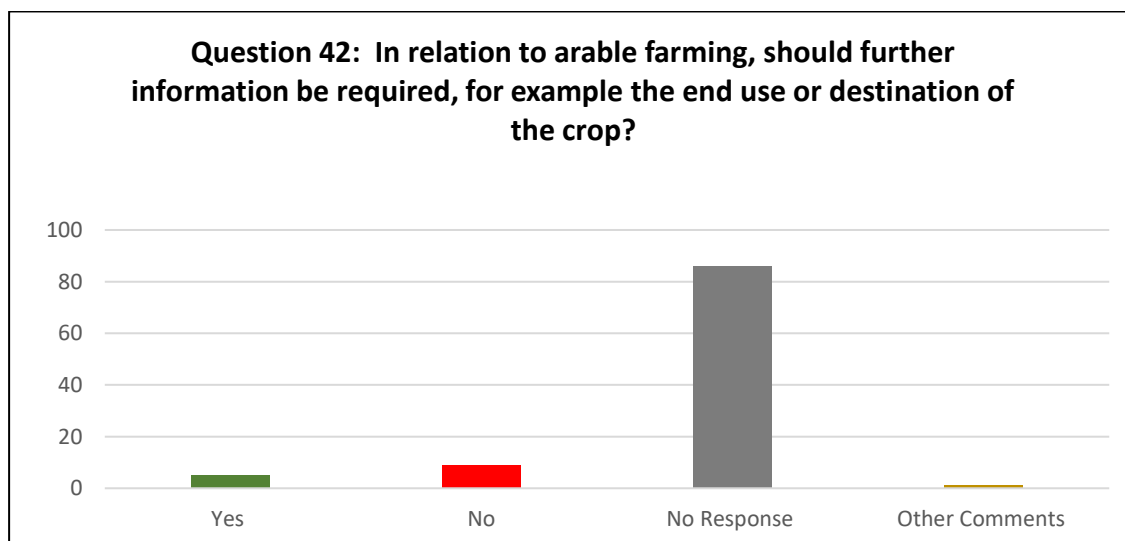
Summary of Other Responses:

- The definition of an active farmer should not be linked to the single farm payment, as an active farmer should not have to claim subsidies to prove he is a farmer. If a farmer can show information to prove he owns the land and actively farms it, then that should be enough and should not be up to the DAERA;
- The requirements of the existing P1C are adequate;
- No already restrictive. Activity and established business is fine at present;
- Suggest the definition of 'Active Farmer' used by DAERA to determine qualification for subsidy might be used for planning purposes as well;
- Opportunity for the council to seek re-use of (appropriate) buildings prior to new build being considered. This may help to address the number of vacant heritage assets through adaptive and sustainable opportunities for their re-use. Re-use of vacant/underused buildings can strengthen the local distinctive character and local identity of an area (as stated above);
- The number of true NI farmers who maintain the countryside and keep it looking the way it is are disappearing at a rate of close 5% per year. FFA and other farm organisations are battling for change on farm incomes, the last thing we will accept is

any potential young farmer or their parents being deprived of a house to live in on the farm they own and work;

- This is an unnecessary complication, and it would be impractical to determine what constitutes a qualifying flock or herd size. It is better to define a farm as active if the land has been farmed, or the land kept in good environmental condition, for a period of time (the current test of 6 years is reasonable), rather than the "active" status of the farmer.

Development in the Countryside



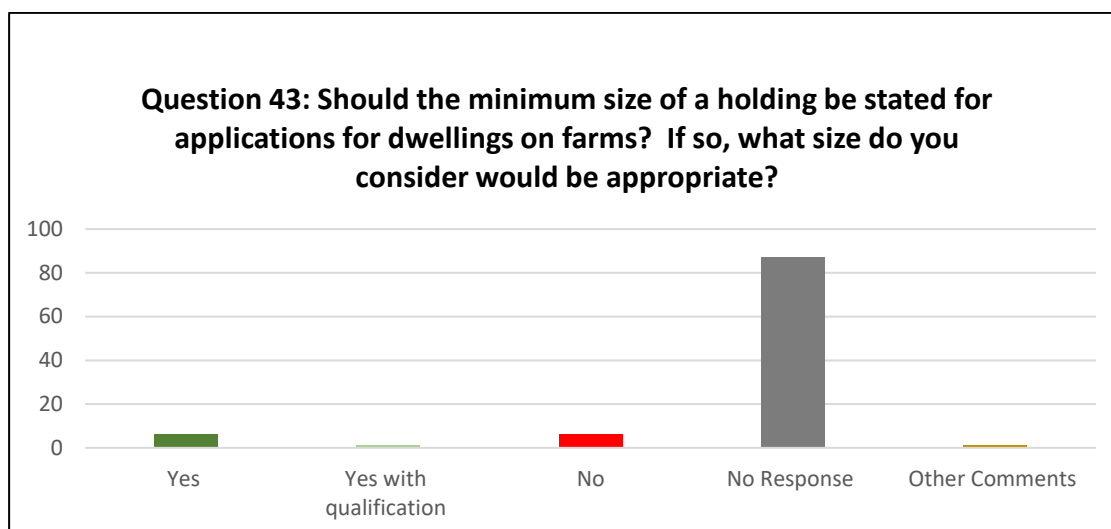
Summary of DfI's Response:

- No Response

Summary of Other Responses:

- No, existing requirements are adequate. If the farm holding is considered viable by DAERA there should be no need for the Council to request additional information;
- Suggest the definition of 'Active Farmer' used by DAERA to determine qualification for subsidy might be used for planning purposes as well;
- The number of true NI farmers who maintain the countryside and keep it looking the way it is are disappearing at a rate of close 5% per year. FFA and other farm organisations are battling for change on farm incomes, the last thing we will accept is any potential young farmer or their parents being deprived of a house to live in on the farm they own and work;
- This is an unnecessary complication and unhelpful as a planning consideration. There may not be a significant crop if the land is managed primarily for environmental benefit. This could include management of wetlands, meadows and woodland.

Development in the Countryside



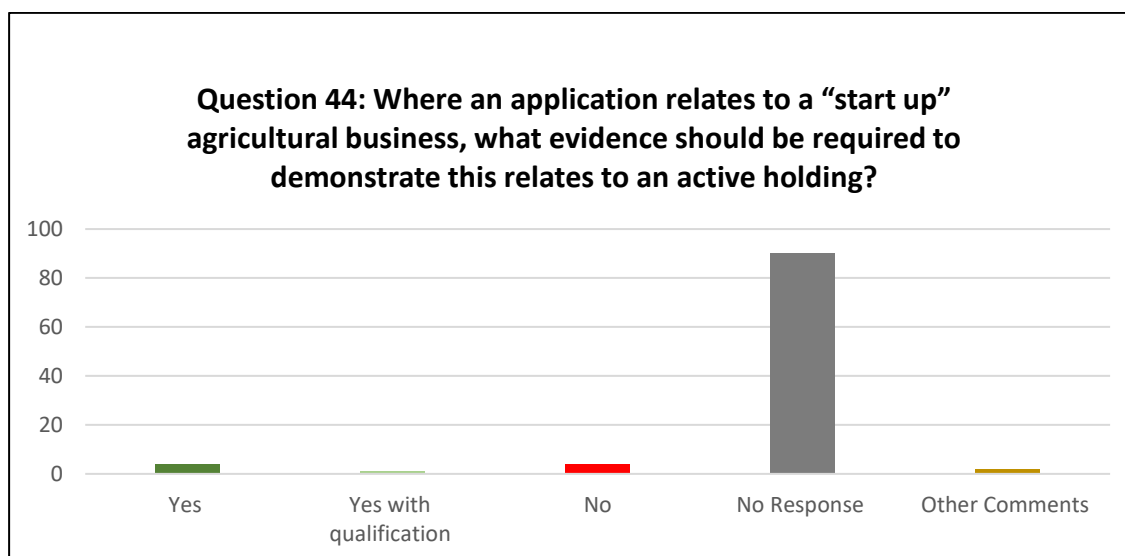
Summary of DfI's Response:

- No Response

Summary of Other Responses:

- 10-15 acres (4-6 ha); 3 ha; .5 acres (2 ha); 20 acres (8 ha);
- No, existing requirements are adequate. If the farm holding is considered viable by DAERA there should be no need for the Council to request additional information;
- No expertise in this area;
- Suggest the definition of 'Active Farmer' used by DAERA to determine qualification for subsidy might be used for planning purposes as well;
- The size of the house should not be size limited as this would restrict larger families;
- This would be unfair for small and very small farms, which are commonplace in the borough. For example, a smallholding, which may involve labour-intensive animal husbandry or high-value produce, may be more in need of an on-site dwelling than a large scale or automated agro-industrial undertaking. An arbitrary size criterion would be difficult to determine and ultimately meaningless.

Development in the Countryside



Summary of DfI's Response:

- No Response

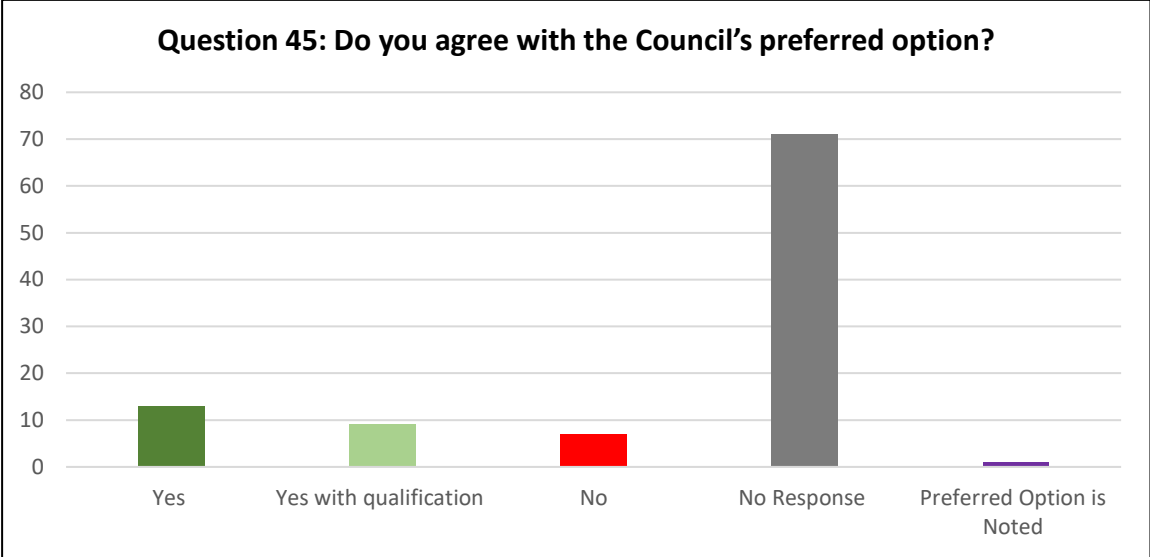
Summary of Other Responses:

- Agricultural certificate, named on herd number, animals in herd, financial statements showing farming activities;
- No, existing requirements are adequate. Evidence that a farm has been established for 6 years or more should be verified through DAERA;
- Not a yes or no question. Visitations should be made by appropriately qualified Council staff to assess such matters;
- Accounts should be examined;
- This would be for CC&GBC to determine;
- While innovation needs to be encouraged, if financial assistance is to be provided, diversification should be possible and monitored;
- Suggest the definition of 'Active Farmer' used by DAERA to determine qualification for subsidy might be used for planning purposes as well;
- It is becoming increasingly difficult for would-be young farmers to 'start-up', if a young person has decided to start farming and has the land available this should be the only qualification needed;
- DAERA Business number, herd book, receipts etc;
- It should be demonstrated that the applicant is a member of the family, lives as part of the farm and is paying rates through an identified dwelling within the farm grouping. Perfectly reasonable to have 9 months proof of payment from a bank account to Land and Property Services.

4.5.5 Development in the Countryside

Key Issue 2: CY2: Economic Development in the Countryside

Preferred Option (Option 4): Retain the principle of the existing policy framework and provide policy to facilitate new small scale rural economic development schemes but restrict in environmentally sensitive or designated areas



Summary of Dfl's Response:

- More detail is required in relation to the preferred approach, especially as regards greater flexibility on farm diversification, however there are some early points of concern. It is regarded that the requirement for the diversification enterprise to be run in conjunction with the farming operation as a strategically important principle of existing policy which is supportive of enterprises of a scale and character appropriate to the countryside. Further clarification would be welcomed from the Council on the measures to guard against schemes of diversification that may result in the replacement of the farming business with an economic development use unrelated to agriculture.
- The Council is reminded that the SPSS identifies that farm diversification, the re-use of rural buildings and appropriate redevelopment and expansion proposals for industrial and business purposes will normally offer the greatest scope for sustainable economic development in the countryside. In the interests of rural amenity and wider sustainability objectives the level of new building for economic development purposes outside settlements must be restricted.
- TPMU: The extent of farm diversification would need to be defined – the preferred option currently refers to non-specific development which could give rise to significantly increased pressure on the transport network.
- Regional Planning & Policy Team: Note the preferred option and would make the following comments:
 - Noted that the current strategic approach to farm diversification is considered within the council to be inflexible and does not sufficiently support rural communities.

- Consider further when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

- Seems a balanced approach;
- The principle of facilitating economic development in the countryside should be to do with a sustainable development pattern rather than impact on a sensitive landscape or designated area. MEA consider the current policy framework permits economic development opportunities in the countryside in a sustainable manner, allowing flexibility for agri-related industries etc;
- Option 3 appears to offer sufficient protection of environmentally sensitive landscapes whilst facilitating farm diversification projects. The Lower Bann corridor should be assessed for such developments in relation to the "hubs" and "sites of significant interest" as defined in the LBSD Action Plan 2017-2030;
- Small developments such as those associated with economic development as part of diversification on the farm are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss of ancient or long-established woodland. Given the prevalence of ancient and long-established woodlands in rural areas, they must be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;
- Support the preferred option on economic development in the countryside - only on the proviso that criteria is included to ensure that any new building allowed under this proposal does not cause any adverse impacts on the landscape or natural environment particularly if the site falls within an AONB;
- Simplify the policies to provide additional opportunities for houses on farms, rural social housing, buildings' re-use and also rural economic development are noted, these are broadly in line with the policy direction that Derry and Strabane is currently working towards in its emerging LDP Plan Strategy;
- Urge the adoption of option 2 as this would allow greater opportunity for small scale rural economic development schemes and deliver on strategic objectives for supporting rural communities;
- Welcome inclusion of comments within para 6.180 towards re-use of vernacular or locally important buildings. Term 'small scale rural economic development' will need to be defined to provide clarity for applicants and agents. Opportunity to create linkage between any new policy to PPS21 CTY4 and PPS6 BH15. However, amendments to the wording of a policy need to be carefully considered not to create confusion or conflict between the aims of each policy during the Plan Strategy stage of the process and in line with SPPS strategic objectives towards archaeology and built heritage. Highlights potential opportunity for councils to identify Historic Buildings of Local Importance in their area (refer to the HED published guidance 'Historic Buildings of Local Importance, A guide to their identification and protection - May 2017). Such a policy approach has the opportunity to reinforce, respect, maintain and strengthen local identity and

character distinctiveness. Opportunity to clearly distinguish between the protections afforded to designated and non-designated. Therefore, may be an opportunity to provide flexibility with regard to potential appropriate and sympathetic re-use of disused non-designated vernacular or industrial heritage. Landscape is inseparable from the historic environment and forms the immediate and wider rural setting of heritage assets. The historic environment and the setting of heritage assets often shares common pressures and strengths with landscape and countryside with regard to sensitivity to development. See Q40 response for common related themes;

- There are many agricultural and industrial sheds in the countryside. Many of these are faced in bright white metal and are visible from a long distance. We would request that the Council could apply a condition to planning approval for such developments. The condition would be that industrial or agricultural sheds should be faced in green to mitigate against the impact on the rural countryside. We would especially emphasise that this should be the case in AONB or countryside which has landscape character;
- Providing limited economic development in the countryside should reduce the need for travel and promote sustainable living;
- Option 4 is too restrictive, young farmers or their parents must have the option to build or replace an existing dwelling as required whether they are in an environmentally sensitive area or otherwise;
- Welcome the restriction on economic development in our most sensitive landscapes and think this restriction should be expanded to include other environmentally sensitive areas to protect biodiversity. However we have concerns about the adverse, cumulative landscape and visual effects over time of adhoc development in the countryside, the magnitude of the impacts of the development such as the storage of the “product” (cars, campervans etc.), additional buildings, signage, advertising, lighting, parking etc. Advise that the preferred option policy wording needs to be very carefully considered;
- Higher consideration should be given to all businesses that survive in the countryside, not just farming related;
- Welcomes the cognisance of the natural environment and recognition of the fact that areas particularly sensitive should be avoided, but this should include species and habitats out with the protected site network. There is also a need for a robust policy that protects priority habitats and species, as per the NI Biodiversity Strategy. Out with environmentally sensitive or designated areas, the requirement for such schemes remains to further sustainable development. The wording of the SPPS should be retained as it promotes sustainable patterns of development and does not create an imbalance in the urban and rural sustainable growth strategies. A fresh approach is required for future rural economic development locations, particularly to those outside settlement limits. The justification for future patterns of allocation should not be based on historic patterns as this is not considered to be a sustainable approach, as they may not necessarily further sustainable patterns of development. The three pillars of sustainable development should be integrated rather than balanced as this could potentially result in environmental trade-offs. Development that fails to respect the environment will ultimately erode the ecosystem services upon which the economy and society rely. Land is a finite resource and the planning system should deliver as much development as possible through development plans that are subject to SEA, informed

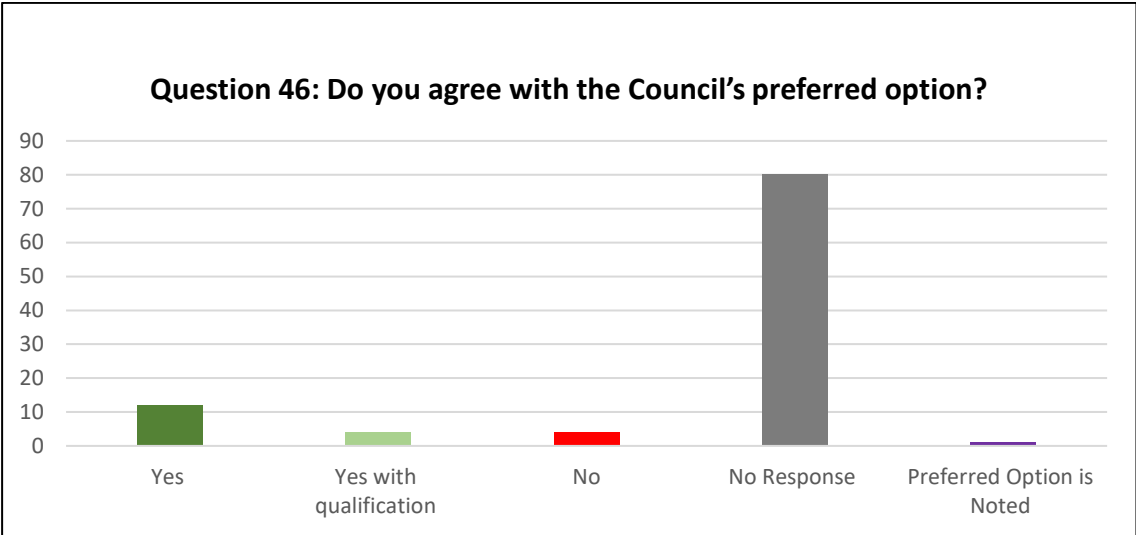
by a robust evidence base. SEAs can ensure that a development plan provides the amount of development that is needed, whilst also ensuring that this level of development does not exceed environmental limits. A robust Land Strategy for NI would assist;

- Agree with the Councils approach to economic development in the countryside which will maintain the settlement first focus of the existing policy framework while allowing greater flexibility in relation to farm diversification. Respectfully request that the Council ensures that there is adequate land available within the small settlements to accommodate economic development proposals to ensure that they are not obliged to locate within the open countryside;
- The approach must be to strike a balance between providing appropriate development opportunities and despoiling the countryside with development that is inappropriate in scale or location. Account will need to be taken of the existing rural communities' needs and the ability of the landscape to absorb new development. We fully support option 4 to ensure economic development can be facilitated within the countryside in sustainable locations to promote vibrant rural communities across the Borough. The existing policies and regional direction promotes, small scale economic development in a positive manner, which sustains and enhances the environment. The decision maker can already achieve this taking account of the site-specific nature and material circumstances of each case;
- Each proposal should be assessed on a case by case basis. It is often the case that in designated areas are found the most agriculturally marginal farm holdings. This could be exacerbated by cheaper imports of non-EU food after Brexit. Rural enterprises, farm diversification and tourism initiatives could be a lifeline to these businesses;
- This would still enable appropriate economic development proposals adjacent to villages and smaller settlements where there is insufficient accommodation within the limits to support rural business, community and settlement;
- Agree with the preferred option as this would still enable appropriate economic development proposals adjacent to villages and small settlements where there is insufficient accommodation within the limits to support rural businesses, community and settlement.

4.5.6 Development in the Countryside

Key Issue: CY3: Provision of Social and Affordable Housing in Rural Areas

Preferred Option (Option 2): Retain the principle of the existing policy framework and provide policy relating to affordable housing, and define small settlements in line with our Settlement Hierarchy



Summary of DfI's Response:

- Council is reminded that the SPPS indicates that LDPs should zone sites for housing in larger settlements to meet the full range of identified need and identify sites or areas within settlements which are required to meet one or more category of need and clearly indicate the proportion required. Council should therefore consider policies and allocation to meet the full range of need indicated through the HNA as part of the overall housing allocation in the plan.
- Regional Planning & Policy Team: Note the preferred option and make the following comments:
 - Noted that the council considers that it may be more appropriate to consider social housing provision as part of a settlement's overall housing allocation and zoning, rather than in addition to it.
 - Will consider further when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

- This is a vital issue, particularly for younger families who wish to remain in/live in their 'home' environment. Too many are being forced out by the lack of affordable housing, a malaise caused in great measure by the inflated market in second homes;
- Small developments such as those associated with housing are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss of ancient or long-established woodland. Given

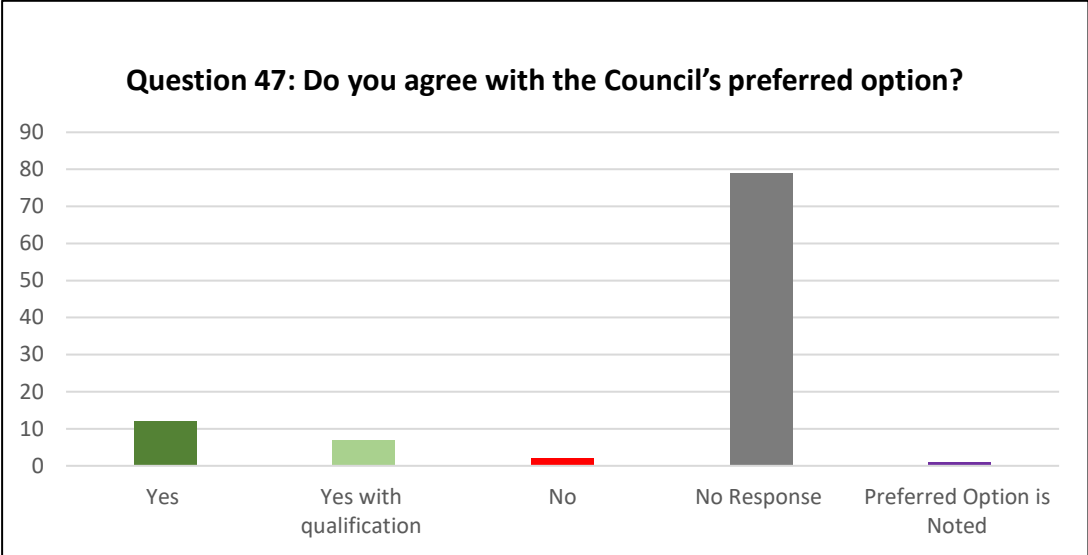
the prevalence of ancient and long-established woodlands in rural areas, they must be protected from damage and/or destruction from these non-spatially dependent developments. The additional inclusion of a 50 m buffer zone around the woodland will ensure sufficient protection for these important habitats, their resilience and existence in to the future;

- Simplify the policies and to provide additional opportunities for houses on farms, rural social housing, buildings' re-use and also rural economic development are noted, these are broadly in line with the policy direction that Derry and Strabane is currently working towards in its emerging LDP Plan Strategy;
- Believe that local social, community, cultural, heritage and historical considerations mean there should be a more relaxed policy in terms of housing in the countryside;
- Acknowledge the need for the council to provide social and affordable housing in the rural area. However, concerned about the potential for the location of small housing developments (no more than 14 units) near or adjacent to small settlements. Agree with the comment in the preferred option justification to include the social housing provision within the settlements' overall housing need. Landscape is inseparable from the historic environment and forms the immediate and wider rural setting of heritage assets. The historic environment and the setting of heritage assets is intertwined and often shares common pressures and strengths with landscape and countryside with regard to sensitivity to development. It is important that the Council is in a position to demonstrate how historic environment evidence has been used in informing zonings and mitigation such as designation or the need for appropriate key site requirements at Plan Strategy stage, i.e. There is a need to ensure that environment historic evidence has been utilised effectively to indicate historic settlement patterns to aid zoning. There may be potential for impacts on heritage assets and their settings, for example, due to utilising/or alterations to historic buildings, or development located in the setting of heritage assets, or impacting on previously unidentified below ground archaeological remains which need to be considered;
- Housing in the countryside should always be provided for those who work or intend to work in rural areas;
- NIHE are experts in social housing. Would be sagacious to follow NIHE findings and permit planning;
- There should be facility for social/affordable housing in small scale clachans, outside of deemed settlements as sometimes these are vital to support small rural communities. In these cases, it would be appropriate for the number to be small - perhaps to a maximum of 5.

4.5.7 Development in the Countryside

Key Issue: CY4: Reuse of Farm Buildings for Non-Farm Related Activities (Non-Residential)

Preferred Option (Option 2): Provide policy to allow greater flexibility in the reuse of buildings



Summary of Dfl's Response:

- This option appears to be closely related to issue raised in Key Issue CY2. Consider that existing countryside policy provides an appropriate balance between development to sustain rural communities and support the rural economy whilst also protecting the countryside from unnecessary or inappropriate development. Concern that the proposed policy approach has the potential to permit schemes of diversification which are incompatible with other LDP objectives for the countryside.
- The proposed approach of providing increased opportunities for economic development uses not linked to a farm holding or agricultural activity has the potential to undermine policy approaches to economic development within settlements, including within rural settlements where development would also support rural communities and sustain the rural economy. Further clarification welcomed from the Council on how such schemes of diversification may avoid replacement of farming businesses with an economic development uses unrelated to agricultural uses.
- TPMU: Reuse of Farm Buildings – the preferred option raises some concerns due to the possibility of traffic generating uses.
- Regional Planning & Policy Team: Note the preferred option and make the following comments:
 - Noted that the current strategic approach to farm diversification is considered within the council to be inflexible and does not sufficiently support rural communities.
 - Also noted that this option would allow greater flexibility in approach by allowing diversification proposals which are not directly linked to the farm holding, which is at odds with the SPPS approach which requires that proposals should be run in conjunction

with the agricultural operations of the farm.

- Consider further when more detail of the council's strategic planning policy approach is provided in the forthcoming draft Plan Strategy.

Summary of Other Responses:

- Only if it is owned and operated by the landowner and active farmer, e.g. farm shop, open farm, cafe on farm etc;
- An extension of the green belts in town and villages in the council area;
- A great variety of new businesses are being set up on farming properties and in the countryside in general. Good internet facilities have made a great contribution to the development of such home-located businesses. Clearly, if a level playing field were created in this respect, every area, irrespective of its location could benefit from this opportunity;
- This would be for CCGC to determine;
- Propose the plan gives a degree of flexibility for the reuse of existing vernacular farm buildings for non-farm related activities to provide greater opportunity for farm diversification proposals and protect such important heritage assets. However, the plan should include policy that such proposals must be in keeping with the landscape character and there should be minimal intervention to the existing external fabric of the buildings. Whilst the POP deals with the reuse of farm buildings, there is no proposal to set out a local plan policy on the reuse of redundant vernacular buildings outside of farms. The local plan should set out policy to promote their sensitive reuse and safeguard their protection;
- Simplify the policies and to provide additional opportunities for houses on farms, rural social housing, buildings' re-use and also rural economic development are noted, these are broadly in line with the policy direction that Derry and Strabane is currently working towards in its emerging LDP Plan Strategy;
- This will provide much needed scope and flexibility for farms and businesses and will encourage the efficient re-use/regeneration of what are de facto rural brownfield sites;
- Welcome emphasis on re-use of existing farm structures in advance of building new structures as the re-use, including the conversion or repair of historic structures will enable the local identity, distinctive character and authentic places to remain. Re-use of buildings in the countryside is in alignment with SPPS 6.24. See response in Q40 for common related themes. Acknowledge the preferred option. However, concerned if the emphasis of the policy text was to include the phrasing "...opportunity for economic development..." To our understanding the three LDP strategic objectives of Social, Economic and Environmental are to be equally balanced, therefore, equally scored within the LDP process. We consider the current phrasing in the POP places the focus on economic growth;
- There are many agricultural and industrial sheds in the countryside. Many of these are faced in bright white metal and are visible from a long distance. We would request that the Council Planning Department could apply a condition to planning approval for such developments. The condition would be that industrial or agricultural sheds should be faced in green to mitigate against the impact on the rural countryside. We would

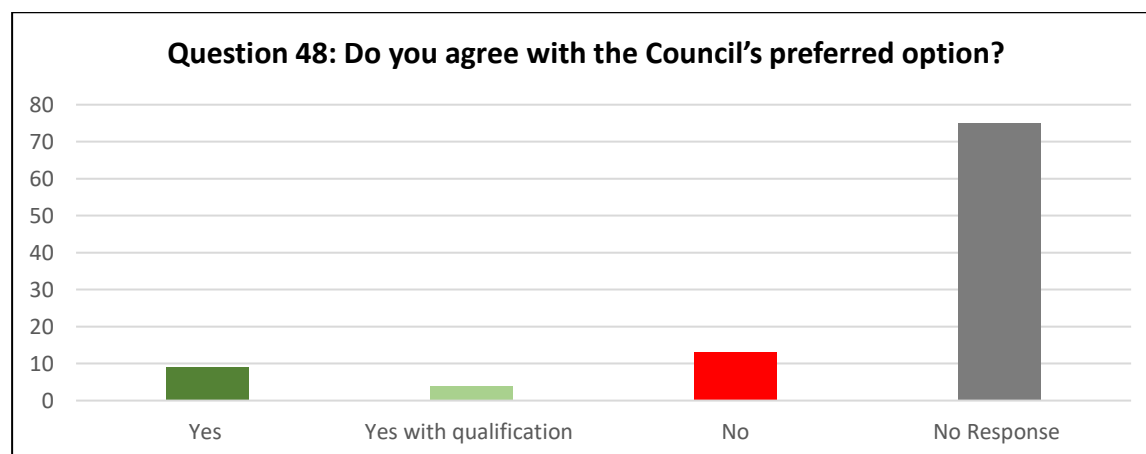
especially emphasise that this should be the case in AONB or countryside which has landscape character;

- Post Brexit, where unsure of future Agricultural Policy, it would be prudent to allow change of use of farm dwellings etc;
- While the principle of re-use of farm buildings appears to be acceptable, the implications are unknown with concerns about potential adverse and cumulative landscape and visual effects over time of non-farm related activities, namely the adhoc nature of development, the magnitude of the impacts, the cumulative impacts, the lack of mitigation measures etc. Advise that the policy wording needs to be very carefully considered;
- Design should be a high consideration. In many rural locations where businesses are incorporated, design is the last consideration - whereas it should be the first.
- The re-use of existing buildings for economic development and tourism is clearly sustainable and minimises the impact on the landscape whilst utilising existing infrastructure. It should be actively encouraged where “suitable” buildings exist to support rural businesses and communities and the preferred option is supported.

4.5.8 Giants Causeway and Causeway Coast World Heritage (WHS)

Key Issue: WH1: Development within the World Heritage Site’s Distinctive Landscape Setting

Preferred Option (Option 3): Review the existing policy framework and retain the existing designation



Summary of DfI’s Response:

- Council should ensure that it takes account of the regional policy in the SPPS and that emerging policy is backed up by a robust evidence base. Encourage the Council to ensure that the integrity of the World Heritage Site, the only one in Northern Ireland, is retained. The Council should ensure that in any review, planning policy is not linked to land ownership which is subject to change.

- This issue links back to the strategic environmental objective to protect areas of high scenic value (landscapes and seascapes) from inappropriate development. Note that the preferred option is not the most sustainable option identified in the Sustainability Appraisal, and wishes to remind the Council of the purpose of the SA (set out in DPPN04) which is to promote sustainable development through the integration of social, environmental and economic considerations into the preparation of plans and programmes such as local development plans. The Council may wish to consider if the preferred option fulfils the strategic environmental objective to protect areas of high scenic value from inappropriate development.
- Regional Planning & Policy Team: Note the council's preferred option. It is notable that the council consider Option 1 to afford the greatest level of protection to the world heritage site (WHS) but have however chosen Option 3 as the preferred approach. Option 3 seeks to review the policy which permits development only in exceptional circumstances within the WHS distinctive landscape setting. Justification text from POP stated.
- RPD would draw attention to the provisions of the SPPS with respect to WHS - with paragraphs 6.6 and 6.7 listed and stressed.

Summary of Other Responses:

- Some review of the facilities and services provided in the area is clearly required;
- This would be for CCGC to determine;
- The exceptional level of protection afforded to World Heritage Sites in the SPPS must be replicated in the LDP. Environmental protection policies within LDPs must effectively pursue their objectives, that is, protection of the environment. It should not be a focus of environmental protection policies to balance environmental protection with other priorities - there are economic development policies that will support economic development. Given the reliance of the tourism and agriculture sectors on the Borough's high quality rural landscapes, as well as the wider ecosystem benefits, climate change mitigation measures and benefits to community health and wellbeing provided for through resilient landscapes - appropriate protection must be afforded to these important and sensitive sites from development. Small developments such as those associated with housing, tourism, retail and economic development are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss to important and sensitive habitats and sites, such as ancient or long-established woodland;
- We strongly support the retention of the Distinctive Landscape Setting designation but we are concerned that a relaxation of Policy COU 4 in the Northern Area Plan would result in lesser protection to the setting of the WHS. WHSs are designated under the UNESCO World Heritage Convention of 1972 on the basis of their acknowledged Outstanding Universal Value. The safeguarding of the Giant's Causeway and Causeway Coast WHS is of utmost importance. The SPPS explicitly states that development that would adversely affect the Outstanding Universal Value of a WHS or the integrity of its setting must not be permitted unless there are overriding exceptional circumstances. On that basis, we propose that Policy COU 4 should not be softened. Alternatively, a

similar policy approach could be applied as the adopted by Allerdale Local Plan that covers Hadrian's Wall WHS (an extract from the relevant plan is attached). In addition, whilst we understand a WHS management plan is in existence, one should be produced as part of the local plan process and used as a tool / material consideration in decision making. It should define the attributes of the WHS. The wider landscape setting of the WHS may exceed beyond the identified boundary designation. Recognition to this should be given in policy. The plan should also make reference to the use of the ICOMOS guidance on Heritage Impact Assessments in WHS. A copy of which is enclosed with this submission;

- Suggest Option 4. Some review is clearly called for. It would be good to have 'exceptional' circumstances defined as it could allow for inappropriate development in WHS. The character of the landscape round the WHS has already developed enough. The double yellow lines a strongest possible protection for the area;
- Agree with the preferred option on the basis that the preferred options for Issues NH1 and NH 2 are adopted, giving a higher level of protection to SCAs and AONBs. If those options are not adopted, I believe the council should revert to Option 1;
- Option 1 should be the preferred option for the appropriate protection, conservation and enhancement of the historic environment around the World Heritage Site (WHS), and to ensure policy direction is in alignment with SPPS (item 6.6) -Development that would adversely affect the Outstanding Universal Value of a World Heritage Site (WHS) or the integrity of its setting must not be permitted unless there are overriding exceptional circumstances. Seek more clarity on council would reconcile the definition of 'everyday' need with 'overriding exceptional circumstances'. The council must consider how the WHS own management plan sets out to protect, conserve and present the outstanding universal value (OUV) of the site. Therefore, there are opportunities that policies can be tailored to enhance the OUV of the WHS;
- There are many agricultural and industrial sheds in the countryside. Many of these are faced in bright white metal and are visible from a long distance. We would request that the Council could apply a condition to planning approval for such developments. The condition would be that industrial or agricultural sheds should be faced in green to mitigate against the impact on the rural countryside. We would especially emphasise that this should be the case in AONB or countryside which has landscape character;
- The Giant's Causeway and Causeway Coast WHS enjoys protection through sections of the Regional Development Strategy 2035 and the Strategic Planning Policy Statement for NI (SPPS). The SG feels it is important that these are referenced in relation to the options which may affect the WHS. Regional Development Strategy 2035 policies RG4 and RG11 are relevant as are SPSS PPS2, PPS6 and BH5. Re: Key Issue: NH1: The majority of the WHS SG members support adoption of Option 2. The WHS is situated within the Causeway Coast AONB. It is understood that if the WHS and Causeway Coast AONB are designated a Special Countryside Area this will afford greater protection to the Distinctive Setting and Wider Setting of the WHS than is proposed in Key Issue WH1 (Question 48). The WHS SG recommends the adoption of another option as this will provide the greatest level of protection for the WHS and its Distinctive Setting. The rationale for change is mentioned in the POP but neither detail nor evidence has been provided and no information given on how an alternative form of protection for the

Distinctive Setting would be achieved. In particular, details of the population, the dwelling context, and types of development pressure within the Distinctive Setting has not been provided beyond 2010.

The SG understands, accepts and supports that the Distinctive Landscape Setting was established to ensure that additional scrutiny was given to proposals within this zone, in relation to impacts on the Outstanding Universal Value of the WHS and the geographical setting of the WHS, and that the measure was not intended to prohibit all development proposed by landowners and residents. The SG recognises that the Distinctive Landscape Setting is an inhabited and agricultural area. Part of the SG's Vision is: "This Site will become a vibrant thread of the life of the Causeway Coast and Glens, benefiting local and regional communities, visitors and the environment for present and future generations". The SG suggests, as with other sensitive areas, that a planning guide, or guidelines, should be developed for the Distinctive Setting covering design and scale. This would better equip and inform those seeking planning permission and would aid planners in the decision-making process. The WHS SG notes that DAERA/ NIEA, State Party representative for WHS in Northern Ireland, is also in favour of Option 1.

Note: the SG does not reject Option 2 and Option 3 but requires comprehensive information to be presented before an informed decision could be made;

- Essential to balance the greatest protection of the World Heritage Site with sustainable development by local landowners within the designated area;
- Option 4 is preferable. Possible that current extent of Distinctive Landscape Setting is larger than required to protect the World Heritage Site. This should be reassessed and reduced. Agree that policy wording must be revised to allow greater flexibility for appropriate development such as conversions, utilities, agriculture, tourism etc.;
- Option 4 is preferable. Option 4 allows for a structured assessment and proper definition of the distinctive setting on the WHS together with drawing up appropriate policies. That assessment should take account of Giant's Causeway WHS Management Plan 2013-2019 which defines the distinctive setting. LDP should employ an accredited methodology to define 'distinctive setting' of the WHS based on principles and considerations of those elements of the setting that impact on the Outstanding Universal Value and Integrity of the WHS. Policies contained in NAP 2016 are overly restrictive, specifically designation COU3 and COU4. Policies in new LDP must incorporate sufficient flexibility to permit development that is important to local economy, in line with UNESCO thinking, while at same time having no material detrimental impact on the OUV of the WHS. The policy should be focused on the prevention of inappropriate development rather than all development in line with the principles provided by UNESCO, SPPS, NPPS, other LDPs and the WHS Management Plan for the Site itself;
- Option 1 is preferred option and scored as the most sustainable option. Concerns that option 3 rather than option 1 has been brought forward. Understand the only reason not to bring forward the highest scoring option is if it is considered that adequate mitigation measures can be put in place. However, given the landscape and visual character of the Distinctive Landscape Setting of the WHS which is of international importance, mitigation cannot be easily achieved without in itself, adversely impacting on the landscape and visual character of the area. Recognise the necessity of meeting

everyday needs of local landowners but there is considerable pressure for other forms of development such as tourism which will result in adverse, cumulative landscape and visual effects over time in this highly sensitive landscape. Therefore considerable concerns about any weakening of the policy wording and advise it needs to be carefully considered and restricted to the everyday needs of landowners;

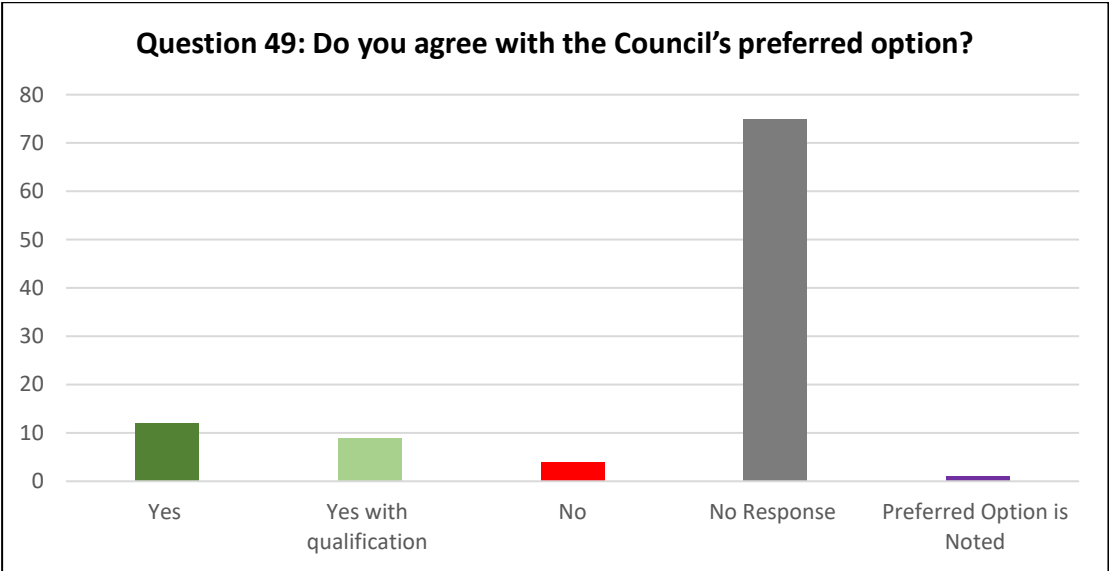
- Option 4 is preferred option. Context has changed in terms of pressure, growth and people movements. Design quality must be 'excellent' and not 'good';
- With reference to the SA Matrices, the following comments are made: Key issue WH1 Option 3 is the preferred option. In the summary, it is stated that there will be no likely significant effects (page 251). Is there evidence to make this statement? Sustainability Objective 13 admits that the option may 'enable some visual intrusion' and that a new boundary 'may have negative impacts on both the WHS and coastal views'. The existing policy referred to in option 1 has been through a robust public inquiry and been found to be appropriate to protect a landscape designation of the highest level. Without the detail of the 'reviewed' policy, the precautionary principle should apply and the likelihood of significant effects should be acknowledged;
- Retail NI supports the preferred option, which provides flexibility for landowners and farmers, whilst protecting the landscape setting of the WHS.

4.6 INFRASTRUCTURE OPTIONS & COMMENTS

4.6.1 Transportation

Key Issue: TP1: Encourage Active and Sustainable Travel

Preferred Option (Option 3): Identify potential transport hubs and provide policy to ensure active and sustainable modes of transport are accommodated in new development



Summary of Dfl's Response:

- Accept that the Council's chosen approach may improve connectivity and integration between the transport hubs and new development but further clarification is required as to how active and sustainable travel will be encouraged elsewhere in the Borough. Council should also consider the possible implications of its intention not to carry forward the General Principles 1-12 set out in PPS13 for the preferred approach.
- Council is reminded of the SPPS requirement to identify and safeguard disused transport routes such as former railway lines and canals where there is reasonable prospect of re-use for future transport purposes. Where this is not the case, consideration should be given as to whether protection should be afforded through the Plan for alternative purposes such as a recreational, nature conservation or tourism related use. Accordingly, support would be given to a co-ordinated approach between the identification and safeguarding of disused transport routes, the promotion of active travel networks, sustainable transport in new development and the identification and protection of greenways. Co-ordination of all aspects is crucial in order to deliver a coherent functional network rather than fragments of a network.
- TPMU: The clearest way of achieving this would be to use the Accessibility Analyses tool – this can be employed both at the strategic site selection stage and in the Development Management process.
- Regional Planning & Policy Team: The Council has acknowledged the various policies currently in place and they propose to adhere to these with an emphasis on ensuring active and sustainable travel. The preferred option (TP1) seeks to improve further the

connectivity and integration between potential transport hubs and new development (these main hubs are those identified in the RDS). It promotes a wider modal shift to encourage the use of sustainable transport and active travel. This approach is consistent with the SPPS and therefore welcomed.

Summary of Other Responses:

- The rural passenger must not be forgotten here. Towns are clearly better served at present and the needs of the rural passenger is often forgotten/goes unheeded, a serious matter in light of our demographic profile;
- Broadly support the preferred option. Recommend that the full advantages of accessible greenways must be considered in the active travel proposals. They must add to biodiversity, provide connectivity between habitats, and be sensitively implemented so as not to cause damage or destruction to current habitats or biodiversity rich sites - this can be achieved through well informed design, native tree planting, wildflower meadows etc;
- Agree in principle but wish to stress the importance of including the local hubs – Ballymoney and Ballycastle – as transport hubs along with the two main hubs - Coleraine and Limavady. Transport hubs at all four towns to link up with our National Trust properties at Cushendun, Carrick-a-Rede, Giant’s Causeway and Downhill would give a better visitor experience. Smaller transport hubs may be sustainable primarily for tourism purposes and not just that of the local population. The Council should therefore examine more than population critical mass when assessing the economic viability of such transport services in the hubs. Also, it is important that the Council’s plan works in conjunction with neighbouring plans and the transport plans being prepared by the Department for Infrastructure (DfI);
- This should include co-ordination of Derry and Strabane's Greenway Initiatives and both councils need to consider the implications of that council's Transportation Studies (with DfI) including parking and the impacts of major infrastructure such as the new A6 and A2 upgrades especially;
- The council recognises that there is little we can do to influence the provision of major roads and infrastructure projects but will continue to lobby central government to improve road networks across our district;
- No reference or provision is made in paragraphs 6.211 to 6.219 for electrification of the transport network system which is a key tenant of the low carbon economy;
- Welcome the approach. The council must demonstrate how historic environment evidence has been used and how heritage assets have been considered in relation to where potential facilities are located, and in relation to appropriate designation and key site requirements. Key site requirements should include provision for archaeological assessment so that any previously unidentified archaeological remains can be located and recorded or protected. Evaluation is necessary in relation to these schemes, to ensure that the historic environment, heritage assets and their settings are appropriately considered. It will be appropriate to include more detail on heritage assets on your maps at PS Stage. Query the statistical analysis which is used to provide

the conclusion in the POP that 61% of population had no or limited access to private transport;

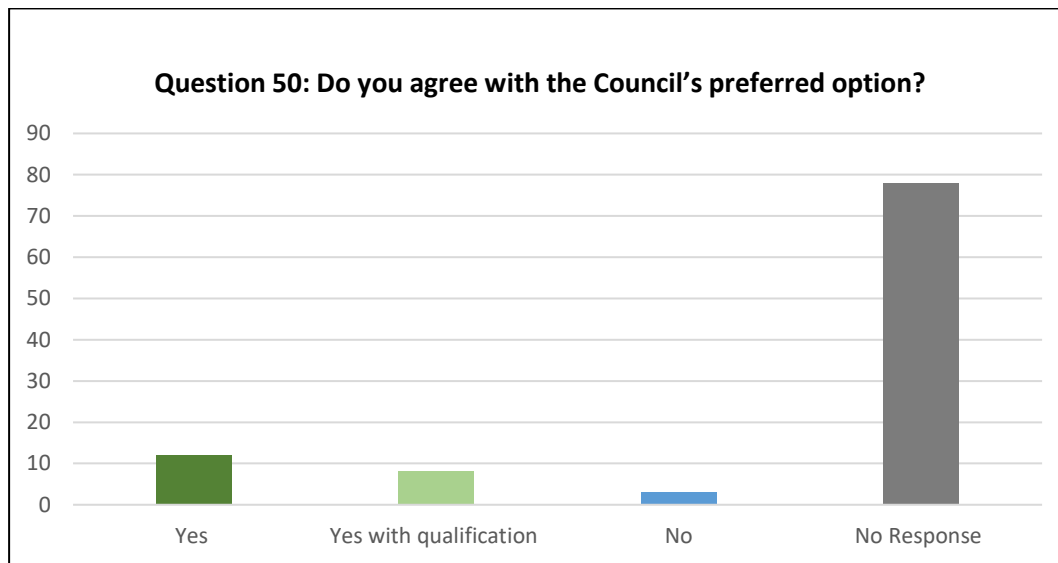
- Castlerock is fortunate in having both train and bus services. The bus service during weekdays is reasonable, but is non-existent at night and at weekends. The train service has become much more heavily used since the upgrade of the line and increased number of trains. It is possible to take a train from Belfast to Coleraine (though not Castlerock or Londonderry) after 10.00pm and so make the most of events in Belfast, Ballymena and other towns in the Council area. However there is no late evening train from Londonderry to Coleraine or further. It becomes necessary to use a car for evening outings;
- Consideration should also be given to provision of strategic P&R site along existing public transport routes;
- To date EU rules on transportation have served us well, internally for the Council's work and responsibilities transportation should be carried out cost effectively in-house;
- Plans say that transport hubs are only possible in larger settlements. However, essential that rural population has access to public transport. Plan must be rural proofed to ensure rural dwellers are not discriminated against;
- Priority should be given to locations where a train station already exists, or is able to be developed. This is the most sustainable form of transport and takes pressure of roads;
- Supportive of the preferred option and note that Council accepts regarding option 1 that: "it is probable that transport hubs are only possible in the Borough's larger settlements where there is a critical mass of population to sustain an economically viable modal shift". This would therefore presumably apply to the hubs (Ballymoney) and towns (Bushmills). Also agree that Option 2 will ensure that active and sustainable travel is incorporated into the early stage of design and layout of new developments. Presume this applies to the hubs and towns such as Portstewart. Also agree that it will ensure that active and sustainable travel is incorporated into the early stage of design and layout of new developments;
- Transportation of people and goods is crucial but accounts for 21% of the UK greenhouse gas emissions, with cars alone accounting for 12%. Welcomes the POP's ambition to reduce congestion and promote sustainable travel. The integration of transportation with the spatial growth strategy, which if conducted correctly, could potentially made the single greatest contribution to securing sustainable transport and active travel within the Borough. Walking and cycling should be promoted generally, not just in new developments, while targeting new routes could create a sustainable product for visitors, improve health and well-being, make connections with nature, enhance biodiversity, and reduce emissions. Protecting disused transport corridors for future public access should be considered. Appreciate the difficulty of reconciling the need for some development in rural areas with an ability to serve that development with good public transport connections. However, any development that is likely to generate significant movement and that cannot be adequately served by public transport should be refused. Wider climate change implications dictate that local development cannot be allowed where it compromises the objective of minimising carbon emissions associated with new development;

- Broadly agree. Non-vehicular modes of transport and off-highway routes (such as greenways) should be encouraged by the identification In the LDP of old railway lines, riverbanks and canals. Coleraine Harbour has an important role in handling heavy materials (currently scrap metal export) which would otherwise go by road.

4.6.2 Transportation

Key Issue: TP2: Parking Provision at Key Tourist Assets

Preferred Option (Option 2): Identify areas of parking restraint around the tourism asset and provide policy to facilitate the provision of sustainable and sympathetic provision of off-site parking



Summary of DfI's Response:

- Recognition that this option in conjunction with the preferred approach under key issue TP1 has the potential to improve environmental quality around key tourist assets.
- Council does not appear to consider car parking provision in other locations outside of key tourist assets. Council is reminded of the requirement to prepare a car parking strategy and to consider and identify park and ride/park and share sites where appropriate. Council should promote parking policies that will assist in reducing reliance on the private car and help tackle growing congestion. This is considered necessary to bring about successful place making and encourage more sustainable forms of transportation such as walking and cycling in line with the Regional Strategic Objectives set out in the SPPS.
- DfI Roads - Agree with and welcome the preferred option to identify areas of parking restraint around the tourism assets and provide off-site parking. Careful consideration must be given to the existing infrastructure in the identification of off-site parking. Parking provision should also be considered in the context of an overall strategy encouraging greater use of public transport, walking and cycling.

- TPMU: Councils Car Parking Strategy will need to consider more than just parking around 'key tourist assets'. The Car Parking strategy should be developed in conjunction with DfI to ensure integration with the forthcoming transport strategy/ plan.
- Regional Planning & Policy Team: The preferred option proactively seeks to reduce the presence of car and coach parking at key tourist assets. The twofold approach of this option will also provide policy to facilitate the provision of sustainable and sympathetic provision of off-site parking. This will reduce private car use to the key tourist asset, promote the use of alternative sustainable transport modes and reduce traffic congestion. This approach is consistent with the requirements of the SPPS and is welcomed.

Summary of Other Responses:

- Clearly, the considerable parking problems currently experienced at both our major and minor tourist attractions must be addressed with urgency, not least for environmental and in some cases quality of life implications for residents;
- This would be for CCGC to determine;
- Parking provision is not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss to important and sensitive habitats and sites, such as ancient or long-established woodland. They should be sensitive to and appropriate for the surrounding environment and the tourist offering;
- We very strongly concur with the preferred option and welcome identifying Areas of Parking Restraint around key tourism assets with the exception of using existing parking areas. Off-site parking (Park and Ride schemes) identified in appropriate sensitive locations without causing any demonstrable harm to the setting of the Giant's Causeway WHS should be encouraged to help with daily operational issues particularly in the peak season and improvement of the overall visitor experience. This approach is the norm in many other WHS's and sensitive tourism sites around the world. Such identified Park and Ride sites should be able to facilitate growing tourism numbers for the 15 year plan period with coherent connectivity between the tourism sites being provided;
- It is acknowledged that individual councils will develop their own policies to address issues whilst ensuring they do not conflict with the policies of neighbouring councils;
- Clearly, the considerable parking problems experienced at our major and minor tourist attractions must be addressed with urgency, not least for environmental reasons. Needs better signage;
- Welcome the approach, and the justification text that Key Issue TP1 and TP2 are linked, and that both options will allow the environment around the (tourist) asset to be protected. Council to have due regard when considering the impacts of inappropriate tourism infrastructure which diminishes authenticity and attraction of heritage assets. In relation to bringing forward bespoke tailored policy forward: There is potential for policy consideration to include a heritage-led regeneration approach, or the inclusion of conservation plans to ensure a considered and sensitive design approaches are at the forefront in the decision making process, to enhance existing policies and statutory

designations afforded to the historic assets and their setting. Highlight that, in considering parking issues around heritage assets which are tourism assets, there is a need to consider the setting of the asset, and it should be demonstrated how this issue has been considered alongside the historic environment evidence base in defining areas around these assets. With many of the historic assets in the Borough, there will also be issues of below ground archaeological remains and adjacent historic buildings or sites whose settings should be protected as per SPPS strategic policy. Acknowledge concerns around the impact of inappropriate tourism infrastructure which diminishes authenticity and attraction of heritage assets. Important that historic environment evidence base is properly assessed to enable an understanding to aid the characterisation of potential Tourism Opportunity Zones. Welcome recognition of the part heritage plays in the area's vibrancy (justification text to preferred option – Dunluce Castle and the Giants Causeway area) - a unique historic and natural environment which is particularly dramatic along the coastline. Highlight how tourism can also financially benefit heritage assets by the reinvestment of a percentage of the money they generate into their conservation - opportunity to reinforce this reinvestment through policy. An opportunity has been missed by not including or developing options around other specific tourist heritage assets in the area. Are opportunities eg to develop options to protect, conserve and enhance the heritage associated with eg wealth of heritage within Bushmills town or the country estates/demesnes around Limavady, or to consider the group potential of the many coastal castles in the area. Highlight the importance of acknowledging and understanding that 'lesser' known heritage assets require protection too, e.g. local vernacular heritage assets, as these which suffer from inappropriate development pressures without the protection afforded through designation. Welcomes the promotion of the historic environment and heritage assets as key tourism destinations. Exploiting the region's historic environment plays a decisive role in attracting outside investment. Highlight importance of maintaining and utilising heritage assets and their settings for sensitive approaches compliant with the SPPS, to maintain the district's distinctive historic environment character. Specifically highlight how areas of distinctive landscape and authentic heritage have been attractive to the film, and consequently tourist industries. This authenticity and sense of place is important to retain. Note: The historic environment and the setting of heritage assets often share common pressures with regard to sensitivity to tourist development, such as impacts directly on the asset, on its setting, removal of assets or impacts on below ground archaeological remains. In relation to bringing forward bespoke tailored policy: There is potential for policy consideration to include a heritage-led regeneration approach, or the inclusion of conservation plans to ensure a considered and sensitive design approaches are at the forefront in the decision making process, to enhance existing policies and consider statutory designations afforded to the historic assets and their setting. Disappointing that the "Study of the Economic Value of the Historic Environment" to the wider economy was not referenced in this section, report by RSM McClure Watters - link provided. While not a historic environment issue, there is a lack of reference to aqua cultural activities in the POP, including sailing and canoeing, , particularly given the large coastal zone. Highlight importance of working with neighbouring councils and need for a heritage led approach to ensure continuity

between districts so that the historic integrity of strategic heritage assets is not compromised.

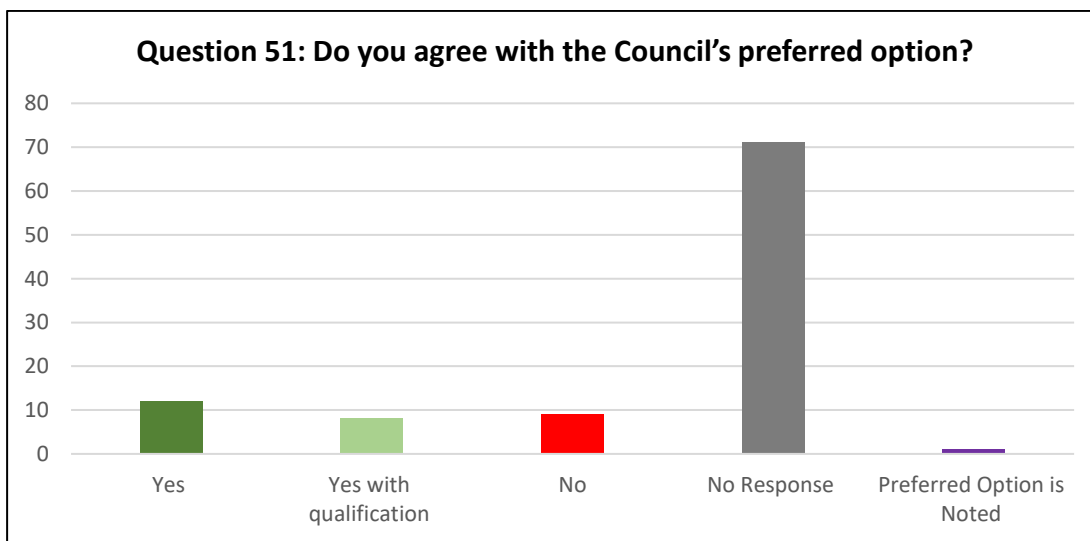
- Historic environment is not limited to the obvious benefits such as recreational or tourism benefits. As it is reflected across all three strategic objections of Social, Economic and Environmental – nurturing a living past is essential to health and *wellbeing, cultural identity, economic growth and sustainability through opportunities by promoting heritage-led regeneration. *For the positive impact the historic environment has on a person's/community's wellbeing refer to comments within the answer to the question posed within Q20 and to the cited Historic England publication "Wellbeing and the Historic Environment".;
- Castlerock - Parking provision in the village has recently become a major issue. The Promenade was redesigned in recent years. The parking there is adequate for large parts of the year but insufficient in high summer, especially in unusually good weather. Congestion on the Promenade spills over into other streets and mobile home drivers hog spaces designed for smaller vehicles. Since Translink upgraded the train line through Castlerock to Londonderry the number of trains has doubled to one per hour in each direction. This has made train use much more attractive to workers, shoppers and visitors. A number of people drive to the train station from outside the village centre and park on our narrow side streets, blocking driveways and narrowing roads for other users, often for many hours per day. There is a need for overflow parking in the village to cope with this congestion. Perhaps this could be found near the hall in Castle Walk. Parking for large vehicles should be restricted on the Promenade and other narrow roads and areas of heavy use;
- It is imperative to ensure adequate sustainable transport modes are considered for key tourist assets as these will encourage visitors and spending to the district. Offsite car parking with bespoke shuttle services should be designed into schemes;
- The WHS SG supports Option 2 which seeks to reduce the presence of car and coach parking beside key tourism assets that rely on special landscapes, and to promote the use of alternative sustainable and sympathetic transport and parking options. The SG is aware of and has approached the DfI regarding concerns, specifically visitor parking, in the wider WHS area (considered as the North Coast). The SG urges that a strategic, holistic approach is taken to visitor transportation, parking, walking and related infrastructure development and management. Specifically, the SG has noted concerns over illegal parking on roads leading to the WHS and the hazards these pose to residents and visitors;
- Provision of off-site parking is welcomed as sustainable approach. However, consideration must be given to meeting demand at or close to the tourist location;
- There is already considerable pressure on some key sensitive environments and a well-thought out and workable mechanism for managing what is only likely to be increased pressure in the future should be put together. This could draw on the experiences of other areas in UK or further afield that have had to deal with similar issues. This issue also links in with Key Issue TO1. Policy should ensure that the identification of any new site adopts an environmentally sustainable approach (including not contributing to increased traffic volumes and private car use), and does not result in the loss or impact on any site sensitive area (habitats and species) whether designated or not. However, it

is difficult to comprehend how the preferred option will be implemented on the ground with regards to existing tourist assets (i.e. essentially retrospectively), particularly where off-site car parking provision falls out with the ownership of tourist asset provider. Such situations could result in the creation of key land values or ransom strips and ultimately a failure to mitigate the problem.

4.6.3 Renewables

Key Issue: RN1: Facilitating Renewable Energy Development Whilst Protecting Our Landscape

Preferred Option (Option 2): Retain the principle of the existing policy framework and designate areas of constraint within our most sensitive landscapes and provide policy for these areas



Summary of DfI's Response:

- Welcome the preferred option which introduces the designation of areas of constraint within the most sensitive landscapes and the application of a stricter policy approach within these areas and will monitor the development of this approach into a more detailed policy response which addresses the range of renewable energy development types and issues during plan preparation. Encourage Council to ensure that all types of renewable energy have been considered in respect of the need, or otherwise, of the designation of Areas of Constraint. It is noted that the Borough is home to a number of active lowland and active raised bogs. Council is reminded that active peatland is of particular importance to Northern Ireland for its biodiversity, water and carbon storage qualities and that any renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest in line with paragraph 6.226 of the SPPS.
- Regional Planning & Policy Team: The principle of the preferred option is noted and welcomed by PPD.

Summary of Other Responses:

- More protection required for the countryside;
- Mid & East Antrim's Preferred Option was to retain the existing policy framework currently provided by the SPPS by adopting a cautious approach within designated landscapes. Whilst the general thrust of both LDPs is therefore to protect the most sensitive areas, it has yet to be determined how a 'cautious approach' in Mid & East Antrim would translate into planning policy in the LDP. It is hoped that the completed LCA and further engagement with our Members and consultees will assist in developing a suitable policy approach. However, one important aspect of this will be to continue to engage with CCGC, particularly in regard to the AONB;
- There is the potential for implementation of a number of relatively small scale hydroelectric generation at weirs and canals along the Lower Bann. Although Option 3 encourages renewable energy development, it is important not to provide excessive protection of the built heritage assets which may prevent such a clean and sustainable means of renewable energy source being progressed;
- Broadly supportive of preferred option but stress the need to extend the increased protection to those sites identified as valuable but may not be designated such as ancient and long-established woodland. Such areas should be protected from all and any development proposals. Given the biodiversity value and irreplaceable nature of the sites, as well as the vital heritage link they provide, they should not be offered up for short term financial gain. Ancient and long-established woodland must be afforded the increased protection in relation to renewable energy development. Also highlight the need to value correctly the ecosystem services and additional cumulative benefits provided for by environmentally sensitive and important sites - such as flood alleviation, air quality, water management, health and wellbeing, resilient landscapes to support agriculture sector, and tourist offering. Cost of cumulative loss of these benefits should be fully investigated before any approval for renewable energy development;
- We support the introduction of Areas of Constraint from Renewable Energy Development and buffers around towns and villages. Such designated areas should include the Giant's Causeway and Causeway Coast WHS and its setting as well as the AONBs. Paragraph 6.223 of the SPPS introduces a policy change to the retained PPS18 whereby a 'cautious approach' to renewable energy development proposals will apply within designated landscapes which are of significant value, such as AONB, the Giant's Causeway and Causeway Coast WHS and their wider setting. The SPPS continues to say that in such sensitive landscapes, it may be difficult to accommodate renewable energy proposal including wind turbines, without detriment to the region's cultural and natural heritage assets. Nevertheless, rigorous policy tests on heritage and landscape considerations should be applied to wind turbine proposals across the Borough such as: the proposal individually and cumulatively will not result in unacceptable harm to the character of the landscape; no unacceptable adverse effects on long and medium range views to and from sensitive landscapes, such as the AONBs and the WHS; and no unacceptable adverse effects on important recognised outlooks and views from or to heritage assets where these are predominantly unaffected by harmful visual intrusion, taking into account the significance of the heritage asset and its setting. Furthermore,

robust policies which protects priority habitats and protected species (e.g. bats) should also be included;

- It is acknowledged that individual councils will develop their own policies to address issues whilst ensuring they do not conflict with the policies of neighbouring councils;
- Whilst the Sperrins Forum has considered renewable policies and high structures, in our adjoining areas of the AONB, further co-operation is required, including agreed joint mapping of wind turbines in particular, to accommodate and protect our adjoining areas in particular. It has also been agreed to share information and consideration of our respective Landscape Character Assessment studies;
- The importance of facilitating the development of wind energy is acknowledged, although this should not be achieved at the expense of the environment. Mid Ulster Council considers the Sperrin AONB as an important shared landscape that is particularly susceptible to the potential adverse visual impacts of wind turbines and high structures. We would welcome the opportunity to continue to work with yourselves to ensure such protective designations in relation to renewables are contiguous across the council boundaries;
- Clarification is sought on the type of concerns in section 6.224 and further details on the source. How have the concerns been reviewed and weighed against the RDS and SPPS promotion of renewable energy. Evidence should be disclosed if it is the intention of the council to prepare policy of the same in the Plan Strategy. Preferred option is a departure from the SPPS and adds an additional layer of spatial protection. No rationale/evidence base justifying additional protection measures. Unclear how this will relate to other landscape designations/buffer zones. Recommend regional planning policy for onshore wind development via DfI. Refer to Newry, Mourne and Down POP which proposes to adopt the current policy approach of PPS 18 and SPPS and its review;
- The proposed greater focus on facilitating the generation of renewable energy is welcomed but as developers we are very aware that wind turbines are not the only source of such energy and that in domestic/residential settings the use of solar panels and associated technologies should be encouraged;
- Planning policy and practice needs to recognise that there are also issues around distribution of power generated through renewable methods, and of grid capacity in the area. There is no point in granting permission to a development that cannot be connected to the grid, because of lack of capacity. While this is a strategic issue, planners need to be aware of the problems and ensure that their decisions reflect the realities on the ground. It is also important to recognise that Renewable Energy generation does not only take place on land, and there are proposals for tidal turbines off the coast at Fair Head and Torr Head. While these will be dealt with initially through the marine planning and licensing system, there remains the issue of bringing the electricity on-shore and across significant distances to where it can be connected to the grid system. This will require some consideration, and probably a degree of collaboration and co-ordination with DAERA's Marine Division to ensure that decisions do not come into conflict. I feel that this issue should have been explored in the POP;
- Welcomes the preferred option and acknowledgment that vulnerable (sensitive) landscapes can be difficult to accommodate renewable energy proposals without a detrimental impact to heritage assets, welcome the inclusion of Areas of Constraint in a

policy approach. Seek clarity on what criteria would be utilised in defining Areas of Constraint. In terms of the impact on the historic environment, the setting of a heritage asset is not only assessed from a visual impact, but rather applies to the ways in a heritage asset may be understood, seen, experienced and enjoyed. Need to consider the protection of the historic environment, as well as the settings of individual and linked or connected heritage assets, from inappropriately sited renewable energy developments. Renewable energy developments (wind, solar and hydro) have the potential to adversely impact on the historic landscape. Concerns regarding the cumulative impact of renewable energy sites and structures (including tall structures, solar fields, including associated infrastructure necessary and so on, e.g. roadways cable trenches) in the vicinity of heritage assets and the wider historic environment. Is important that the creation of Areas of Constraint do not create a perception that applications outside those areas that cause adverse impacts to heritage assets and their settings are somehow more acceptable. Highlight the importance of being in a position to demonstrate how the historic environment evidence has been taken into account toward informing appropriate zoning. Note comments in the justification for scoring in the SA Interim report as to the positive impact that these (and other) developments can have by way of leading to discovery and recording of archaeological remains. While discovery is positive, the destruction of the remains, albeit through recorded excavation, is a significant negative impact on the asset. Mitigation though recorded excavation should be referred to as mitigation or a measure to offset negative impact and the scoring should be adjusted (as elsewhere in the report) to reflect the negative impact;

- The SPPS and PPS 18 currently provide sufficient protection for designated and undesignated landscapes. Prohibition of wind farm development in AONB landscapes is not necessary or desirable, since there are locations within these extensive designations where wind energy development may be accommodated, without detriment to natural heritage assets. Proposed renewable energy developments should continue to be assessed on their own environmental merits and on their compliance with existing planning policy. Designation of additional areas of landscape constraint would serve to unnecessarily limit the potential for future harnessing of our valuable indigenous local energy resources. Local Authorities should rather facilitate options for the harnessing of wind energy to reduce the costs of fuel imports, protect NI from the volatility of international energy prices and improve energy sustainability, especially given uncertainties in our energy future;
- Many more common sense renewables are yet to come on stream. Current corporate created plastic waste (and others) is not being dealt with properly in NI in relation to being used as a renewable - time for the corporate to pay for this; Option 1 provides a more appropriate policy, which allows for a balanced and cautious assessment of the potential impact and the potential benefits of the proposal. The Option 2 applies a spatial restriction of upland areas, based on proliferation of single turbines in lowland areas and does not properly consider the impact of this on existing wind farm sites. It does not consider the implications for energy supply, climate change or re-powering existing wind farm sites that already contribute to the energy network. The Option appears to be based on a visual assessment and does not consider the wider

environmental, social or economic consequence (supporting information relating to Renewable Energy Targets and Benefits of Renewable Energy submitted by RES which provides a more detailed response). RES are concerned that the POP has failed to plan for the increased energy demand from the LDP growth strategy and the limited capacity of NI's aging fossil fuelled power plants, which will be exacerbated through the imminent closure of AES Power Station in Kilroot and one unit at Ballylumford. The focus on restricting new wind energy in Key Issue RN 1 and RN 2 will inhibit the planned growth from being powered from wind, which is the cheapest form of new electricity generation. It will also impede meeting the target for 40% of electricity consumption to be generated from renewables by 2020. There is no evidence that these Key Issues have considered the impact on the un-met renewable energy targets or on the cost of electricity supply for the District's population, or on security of supply. The latter is particularly important in the context of Brexit and the consequences on the all-island electricity market and delays with the interconnector. These are real concerns that have been raised by the NI Affairs Committee and the LDP should not seek to further restrict renewable energy generation without properly assessing the social & economic impact on its population. RES would encourage the Council to promote new energy demand through renewable energy owing to the proven socio-economic benefits. Renewable Energy: provides a more competitive energy pricing structure; provides greater security of energy supply; makes a substantial contribution to the local economy through direct investment, higher value jobs, far reaching support across various industries and provision of business rates; create jobs and employment; is key to tackling climate change, which is particularly important due to the vulnerability of Northern Ireland to potential sea level rise and is therefore extremely pertinent to this District, yet little consideration has been given to it; and assists with decarbonisation. There are hundreds of approvals for single turbines, for which very minimal assessment was undertaken by CCGBC, whereas there are only a handful of approvals for wind farms, which conversely are subject to environmental impact assessment as major planning applications. There is a clear disparity between these 2 types of wind-based development. RES welcomes the Council's proposal to retain a presumption in favour of renewable energy and is generally in support of preferred Option 1: "Retain the principle of the existing policy framework." RES would therefore favour Option 1, provided the criteria based approach advocated in the SPPS are applied to all renewable energy development including single turbines. Conversely RES would be strongly opposed to Option 2 as there is no need to apply a spatially restrictive policy within the LDP as sufficient control is already provided if properly applied. Option 2 would not significantly reduce the quantum of single turbines, which make up the majority of the developments detailed on Map 4, but rather would only act to restrict wind farm developments on upland areas. It would remove the ability for a balanced and cautious assessment of the net benefit of an appropriately designed wind farm. This is short sighted and fails to acknowledge the net benefits of wind energy on tackling climate change, which is one of the main challenges to these uplands areas the LDP is seeking to protect. It also fails to recognise the socio-economic benefits of wind energy, particularly the cost saving per unit of electricity for Council's constituents.

RES is particularly concerned by the conflict between Option 2 of RN1 and the statement in the POP in respect of climate change. The POP acknowledges at 6.209 that “Planning may help mitigate and adapt to climate change by helping to reduce emissions of greenhouse gases that contribute to climate change” but states that at paragraph 6.210 “no options have been put forward in the POP to specifically deal with climate change” as these are “covered by other planning policies”. Option 2 would restrict suitable wind farm development, without a proper balanced assessment and reduce the ability to contribute to tackling climate change. RES firmly believe the existing policies contained within the SPPS and PPS 18 provide a balanced policy approach for the delivery of renewable energy for the district and are therefore opposed to RN1- Option 2. RES favour RN1- Option 1 as this would ensure the protection of designated landscapes, whilst also allowing an assessment of impacts and benefits to be made on a case by case basis.

RES would strongly oppose spatially restrictive policies that fail to take account of the site specific considerations. It is proven that wind energy is the cheapest form of new electricity generation. If policies were developed that exclude viable sites it follows that these policies would be restricting a low cost energy supply;

- The WHS SG supports Option 2 relating to the development of areas of constraint around the most sensitive landscapes. The WHS SG strongly recommends the WHS and its Distinctive Setting be included in the proposed areas of constraint due to the internationally recognised landscape and the Outstanding Universal Value of the WHS;
- Welcome the preferred option to designate areas of constraint on renewable energy within our most sensitive landscapes. The landscape quality and high sensitivity of the AONBs and the WHS and its Distinctive Landscape Setting mean these areas are of particular concern and need protection from all forms of development. Further there has been a considerable amount of wind energy development since the publication of the Supplementary Planning Guidance “Wind Energy Development in NIs Landscapes” in 2010 and some of the comments in the document may need updated;
- Option 1 is adequate. There is no threat to features or landscapes from renewable energy as they can be easily removed at end of their useful life cycle. Important that the public and visitors visually see our commitment to energy and renewable solutions - something we all need to consider;
- Strongly opposed to the preferred option as it will be unduly restrictive to renewable energy developments. The introduction of a spatial approach with a series of landscape designations, protection zones, restricted heights and buffer zones as proposed, will serve to essentially sterilise any potential development opportunities in the Borough. Decisions on renewable projects should be made on a case by case basis. Any move towards a spatial approach must be evidence based and consistent. It is unclear how the proposed landscape character assessment will relate to the existing 2000 LCA series, or if there will be a co-ordinated approach with other councils. There is a need for regional direction/co-ordination on this matter. The preferred option represents a departure from current planning policy in the SPPS and PPS 18. Renewable energy is consistently presented in negative language in the POP with no acknowledgement of its environmental, economic and social benefits and positive contributions. Seek clarification on how the concerns raised regarding the distribution of renewables have

been considered as part of a thorough review process. There is a need to balance policy and general positive contributions of renewable energy development against perceived concerns;

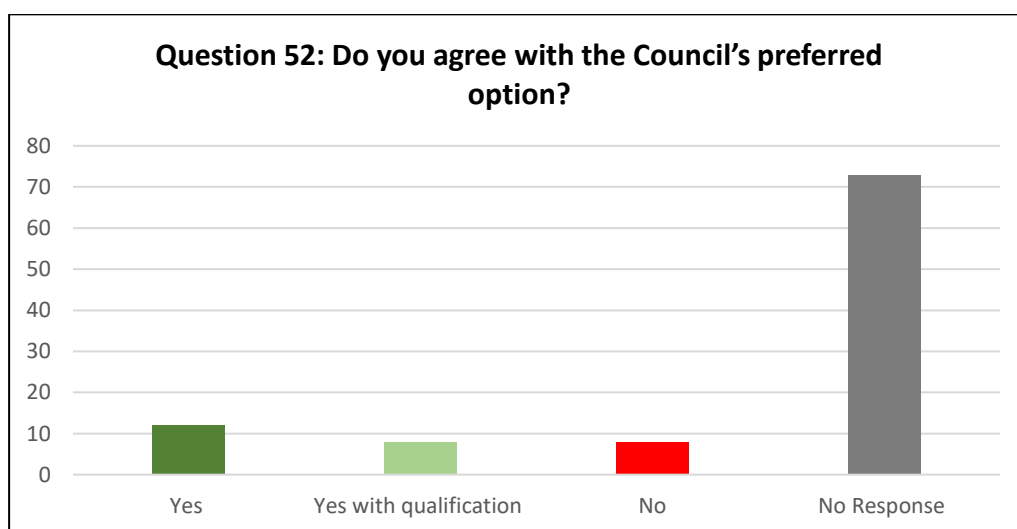
- With the appropriate policies in place, the planning system can help deliver the necessary levels of renewable generation needed for the country to meet its targets on reducing carbon emissions. Delivering the renewable energy infrastructure at the scale required to reduce emissions and meet commitments while remaining sensitive to environmental considerations is a significant challenge. Planning needs to provide a robust and proactive framework enabling sensitive deployment. This will require the collection of a robust evidence base not only of potential to generate energy but also of the social and environmental factors that need to be considered. Note that Mid Ulster's LDP is proposing a strategic spatial approach to renewable energy development. This is recommended for the CCGBC area, but should be carried out at the Regional level to be truly co-ordinated and effective. The scope of potential areas of constraint must include reference to sensitive nature features, as environmental capacity is more than a visual assessment alone, and includes habitats and species – many of which are located out with designated areas. Areas of constraint should also have their nature designations listed. Areas outside of constraint areas must not become the sink holes for development, potential environmental impacts must be thoroughly assessed in decision making. Refer to evidence re DoE Strategic Policy for Renewable Energy Development re need for a strategic and spatial approach to wind energy development in NI. Also Vision Report and UK Government's target of 80% reduction in emissions 1990 to 2050. This will involve significant expansion of low-carbon, renewable energy technologies, of which some will require large areas of land or sea for their deployment and may have negative impacts on wildlife. Therefore important to understand where these technologies can be located with lowest risk for sensitive species and habitats, and to design energy policy so that the UK can meet emissions targets while having minimum impact on biodiversity. Policy wording contained in the SPPS and PPS 18 should be adopted. Needs to be explicit that any development on active peatland will not be permitted unless imperative reasons of overriding public interest. Cumulative impacts of single turbines requires further consideration as, where in proximity, can effectively create a wind farm without being robustly assessed as such. The LDP should give a spatial expression to those areas considered sensitive to wind energy developments and cite their nature conservation designations or features of interest. Likely that other areas will come forward during LDP process. These should extend beyond visual quality/sensitivity and include environmental sensitivity as per the NI Biodiversity Strategy. The LDP should promote the delivery of a strategically planned and integrated renewable energy generation supply, which gives cognisance to the role of the right renewable development in the right place at the right time;
- With reference to the SA Matrices, the following comments are made: Key Issue RN1 No likely significant effects are anticipated on page 288. However, it should be noted that applications for renewable energy may require a Habitat Regulations Assessment under the Conservation (Natural Environment, etc.) Regulations (Northern Ireland) 1995 (as amended);

- Each proposal should be assessed on a case by case basis. It may be that certain types of renewable energy development (such as solar farms or hydro electric installations) could be located in more sensitive areas without any significant impact on the receiving landscape. The LDP appears to give no consideration to woodland/forestry as a renewable fuel source. The demand for firewood, wood chips, wood briquettes and wood pellets is increasing but not matched by supply of home grown timber.

4.6.4 Renewables

Key Issue: RN2: The Impact of the Presence of Wind Turbines outside Settlement Development Limits on Future Settlement Growth

Preferred Option (Option 1): Identify a buffer around our towns and villages where wind turbines will not be permitted



Summary of DfI's Response:

- Note the recognition of amenity issues that can arise as a result of wind energy development, and the intention to minimise any negative impacts from such development is welcomed. It is acknowledged that the extent of buffer zones would be determined on a settlement by settlement basis, taking into account its position in the settlement hierarchy and any constraints in the area, as well as the outcomes of a Landscape Character Assessment. Recognition that the preferred approach would ensure that environmental, landscape, visual and amenity impacts associated with or arising from wind energy developments are adequately addressed in line with paragraph 6.219 of the SPPS.
- Regional Planning & Policy Team: The principle of the preferred option is noted and welcomed by PPD.

Summary of Other Responses:

- Wind turbines have their place but should not be close to inhabited settlements;
- This would be for CCGC to determine;
- The preferred option appears to overlook the significant environmental benefits of wind energy and the UK and International Renewables policies to encourage the development of renewable sources. Wind generation is also a source of income for the agricultural community, helping to sustain family businesses and supporting the role of farmers as custodians of the countryside. The guardianship should be supported for both farm business and environmental sustainability;
- In relation to the buffer zones around towns and villages, developments such as those associated with housing are clearly not spatially dependent or of regional significance. There is no reason why they should be located where they will cause damage or loss of ancient or long-established woodland. Such areas should be protected from all and any development proposals. Given the biodiversity value and irreplaceable nature of the sites, as well as the vital heritage link they provide, they should not be offered up for short term financial gain. Ancient and long-established woodland must be afforded the increased protection in relation to renewable energy development;
- It is acknowledged that individual councils will develop their own policies to address issues whilst ensuring they do not conflict with the policies of neighbouring councils;
- Initial concerns re the principle of buffers around settlements, preventing wind turbine development. Note the settlement hierarchy review is not completed, query evidence base justifying this policy option. Unclear why the POP appears to give priority to housing over renewables. Preferred option lacks detail. When taken alongside other preferred options (regularity measures), this option has the potential to sterilise vast areas of land for wind energy development which is contrary to the SPPS Objectives, with no robust evidence base supporting the policy. The council should provide supporting evidence for the continuation of this option if in the next stage;
- Wind turbines have their place but should not be close to inhabit settlements. In addition they should not be allowed in ANOBs;
- The proposed greater focus on facilitating the generation of renewable energy is welcomed but as developers we are very aware that wind turbines are not the only source of such energy and that in domestic/residential settings the use of solar panels and associated technologies should be encouraged;
- Support the preferred option as it is important that wind turbines are not only located in the most efficient locations (i.e. hill tops) but also that they do not sterilise land which could be used to manage the sustainable growth of settlements;
- Acknowledge the preferred option. Highlight the importance of being in a position to demonstrate how the historic environment evidence has been taken into account toward informing appropriate zoning;
- We note that the council's preferred option is Option 1, however we do not believe it is necessary to designate specific buffers around towns and villages where wind turbines will not be permitted. Wind energy developments could continue to be assessed on their own planning merit, on a case by case basis. Current policy provides for the adequate separation of wind energy development to dwellings. Land should not be

sterilised to wind energy development based on potential future land use. This would be discriminatory against Renewable and Wind Energy development. The adoption of the identified preferred options would unnecessarily constrain the future potential for harnessing of valuable renewable energy resources within this council area;

- Sufficient protection is already provided through SPPS and the other technical standards which pertain to amenity, such as noise and flicker. The legal context provides that the planning systems should not seek to repeat policies or guidance provided by other non-planning legislation. Matters of stability and health and safety are already appropriately restricted and adjudicated by non-planning legislation. The buffer is not necessary if the existing policy (advocated in RES response to Question 51) is properly applied to all forms of wind energy development (see supporting information submitted which provides a more detailed response). RES are concerned that the POP has failed to plan for the increased energy demand from the LDP growth strategy and the limited capacity of NI's aging fossil fuelled power plants, which will be exacerbated through the imminent closure of AES Power Station in Kilroot and one unit at Ballylumford. The focus on restricting new wind energy in Key Issue RN 1 and RN 2 will inhibit the planned growth from being powered from wind, which is the cheapest form of new electricity generation. It will also impede meeting the target for 40% of electricity consumption to be generated from renewables by 2020. There is no evidence that these Key Issues have considered the impact on the un-met renewable energy targets or on the cost of electricity supply for the District's population, or on security of supply. The latter is particularly important in the context of Brexit and the consequences on the all-island electricity market and delays with the interconnector. These are real concerns that have been raised by the Northern Ireland Affairs Committee and the LDP should not seek to further restrict renewable energy generation without properly assessing the social & economic impact on its population. RES would encourage the Council to promote new energy demand through renewable energy owing to the proven socio-economic benefits.

Renewable Energy: provides a more competitive energy pricing structure; provides greater security of energy supply; makes a substantial contribution to the local economy through direct investment, higher value jobs, far reaching support across various industries and provision of business rates; create jobs and employment; is key to tackling climate change, which is particularly important due to the vulnerability of Northern Ireland to potential sea level rise⁸ and is therefore extremely pertinent to this District, yet little consideration has been given to it; and assists with decarbonisation; RES do not see a justification for a buffer around towns or villages and are therefore not in favour of Option 2. Sufficient protection is already provided through SPPS and the other technical standards which restrict noise and flicker. The legal context provides that the planning systems should not seek to repeat policies or guidance provided by other non-planning legislation. Matters of stability and health and safety are already appropriately restricted and adjudicated by non-planning legislation. The Planning Appeals Commission has provided jurisprudence on the siting of turbines and acceptable distances to properties. This would require all proposals, for new and replacement turbines to demonstrate that they would not impinge on matters of amenity and character and can already fulfil the aspirations of Option 2.

Rather Option 1, if properly applied across all forms of wind energy development, would provide sufficient protection for zoned housing land as any application for wind energy development would have to demonstrate that it would not prejudice the amenity and ergo deliverability of housing. RES would strongly oppose spatially restrictive policies that fail to take account of the site specific considerations. It is proven that wind energy is the cheapest form of new electricity generation. If policies were developed that exclude viable sites it follows that they would be restricting a low cost energy supply;

- As long as policy is not unreasonable or punitive;
- Strongly opposed to the preferred option as it will be unduly restrictive to renewable energy developments. The introduction of a spatial approach with a series of landscape designations, protection zones, restricted heights and buffer zones as proposed, will serve to essentially sterilise any potential development opportunities in the Borough. Decisions on renewable projects should be made on a case by case basis. Any move towards a spatial approach must be evidence based and consistent. It is unclear how the proposed landscape character assessment will relate to the existing 2000 LCA series, or if there will be a co-ordinated approach with other councils. There is a need for regional direction/co-ordination on this matter. This is an extremely negative approach in the absence of a clear, established evidence base. Current policy provides robust criteria for assessment whilst allowing the flexibility for planning merits and impacts to be determined on a case by case basis. Within existing policy, adequately assessed windfarm/turbine proposals will not give rise to noise and shadow flicker issues as noted. With respect to structural failure, PPS 18 acknowledges that experience indicates that properly designed and maintained wind turbines are a safe technology. Incidents of failure are very low. Renewable energy is consistently presented in negative language in the POP with no acknowledgement of its environmental, economic and social benefits and positive contributions. Seek clarification on how the concerns raised regarding the distribution of renewables have been considered as part of a thorough review process. There is a need to balance policy and general positive contributions of renewable energy development against perceived concerns;
- With the appropriate policies in place, the planning system can help deliver the necessary levels of renewable generation needed for the country to meet its targets on reducing carbon emissions. Delivering the renewable energy infrastructure at the scale required to reduce emissions and meet commitments while remaining sensitive to environmental considerations is a significant challenge. Planning needs to provide a robust and proactive framework enabling sensitive deployment. This will require the collection of a robust evidence base not only of potential to generate energy but also of the social and environmental factors that need to be considered. Note that Mid Ulster's LDP is proposing a strategic spatial approach to renewable energy development. This is recommended for the CCGBC area, but should be carried out at the Regional level to be truly co-ordinated and effective. The scope of potential areas of constraint must include reference to sensitive nature features, as environmental capacity is more than a visual assessment alone, and includes habitats and species – many of which are located out with designated areas. Areas of constraint should also have their nature designations listed. Areas outside of constraint areas must not become the sink holes for development, potential environmental impacts must be thoroughly assessed in decision

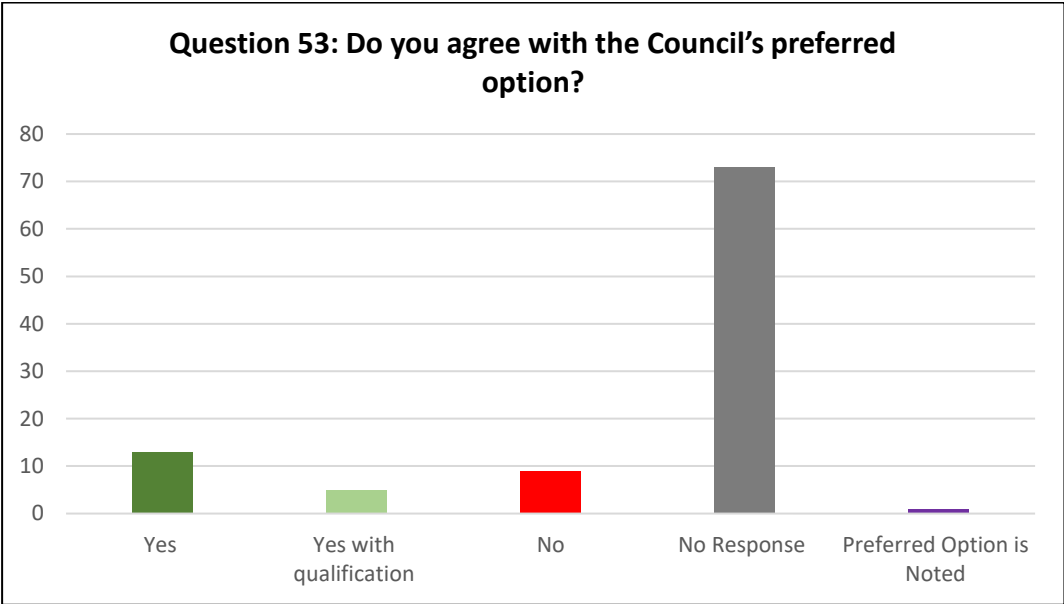
making. Refer to evidence re DoE Strategic Policy for Renewable Energy Development re need for a strategic and spatial approach to wind energy development in NI. Also RS{B 2050 energy Vision Report and UK Government's target of 80% reduction in emissions 1990 to 2050. This will involve significant expansion of low-carbon, renewable energy technologies, of which some will require large areas of land or sea for their deployment and may have negative impacts on wildlife. Therefore important to understand where these technologies can be located with lowest risk for sensitive species and habitats, and to design energy policy so that the UK can meet emissions targets while having minimum impact on biodiversity. Policy wording contained in the SPPS and PPS 18 should be adopted. Needs to be explicit that any development on active peatland will not be permitted unless imperative reasons of overriding public interest. Cumulative impacts of single turbines requires further consideration as, where in proximity, can effectively create a wind farm without being robustly assessed as such. The LDP should give a spatial expression to those areas considered sensitive to wind energy developments and cite their nature conservation designations or features of interest. Likely that other areas will come forward during LDP process. These should extend beyond visual quality/sensitivity and include environmental sensitivity as per the NI Biodiversity Strategy. The LDP should promote the delivery of a strategically planned and integrated renewable energy generation supply, which gives cognisance to the role of the right renewable development in the right place at the right time;

- Broadly agree. This strategy could go further by ensuring that any existing or approved wind turbines that have the potential to affect the future growth of settlements are not granted permission for replacement at the end of their lifespan, nor should planning permission be granted for "upsizing" to larger turbines which could sterilise land on the periphery of a settlement or hinder the review of settlement development limits under the LDP process. The SPPS states that moratoria on applications for renewable energy development are not appropriate whilst LDPs are being prepared or updated. In this borough, however, planning permission has been granted for new wind turbines particularly near settlements. There appears to be a trend for enlarging existing wind turbines and this could blight land with noise or shadow flicker that would otherwise be suitable to meet the need for housing. As an example of this trend, there are three existing single wind turbines very near the southern settlement development limit of Portrush. One was granted planning permission for an increase in size in March 2018. The others are currently subject to applications for planning permission to increase size. The Council should carefully assess all such applications in the context of the emerging LDP.

4.6.5 Flood Risk

Key Issue: FR1: Development in Floodplains

Preferred Option (Option 2): Allow no further development in floodplains or areas where development is likely to exacerbate flooding elsewhere



Summary of Dfl’s Response:

- Note the preferred option would provide a stricter policy approach than that set out in the SPPS by allowing no further development in floodplains or areas where development is likely to exacerbate flooding elsewhere, and further restrictions in areas susceptible to flooding where there is a lack of precise information. The provision of flood risk maps would help to illustrate the main areas at risk.
- Regional Planning & Policy Team: The principle of the preferred option for Key Issue FR1 is noted and welcomed.

Summary of Other Responses:

- Each site should be assessed on merit and consideration should be given to the use of appropriate technical solutions to flooding/drainage issued;
- Climate change means we must legislate for the effects of massive downpours and consequent flash flooding;
- We are not sure how workable the Preferred Option is. How would areas outside existing flood plains, where flooding may be exacerbated by development, be defined? Even within the coastal flood plain, Dfl Rivers advise that infilling will have a negligible effect on its extent and therefore much less likely (than riverine flood plains) to cause flooding elsewhere. Dfl Rivers has stated that flood maps change and evolve over time, therefore it is likely that future revisions will take due account of areas currently outside existing flood plains that are likely to be impacted by development. Pending this we can

only assume that the existing flood maps are sufficiently robust.

It is also noted that the PO (in referring to “Allowing no further development”) does not make any reference to ‘exceptions’ allowed through the existing policy as well as allowance for regionally significant development – all subject to satisfactory FRA. The J&A then also states “this key issue (along with key issue FR2) relates to policy applying outside of existing designated floodplains”. Key Issue FR1 addresses development within flood plains, therefore this text seems somewhat confusing;

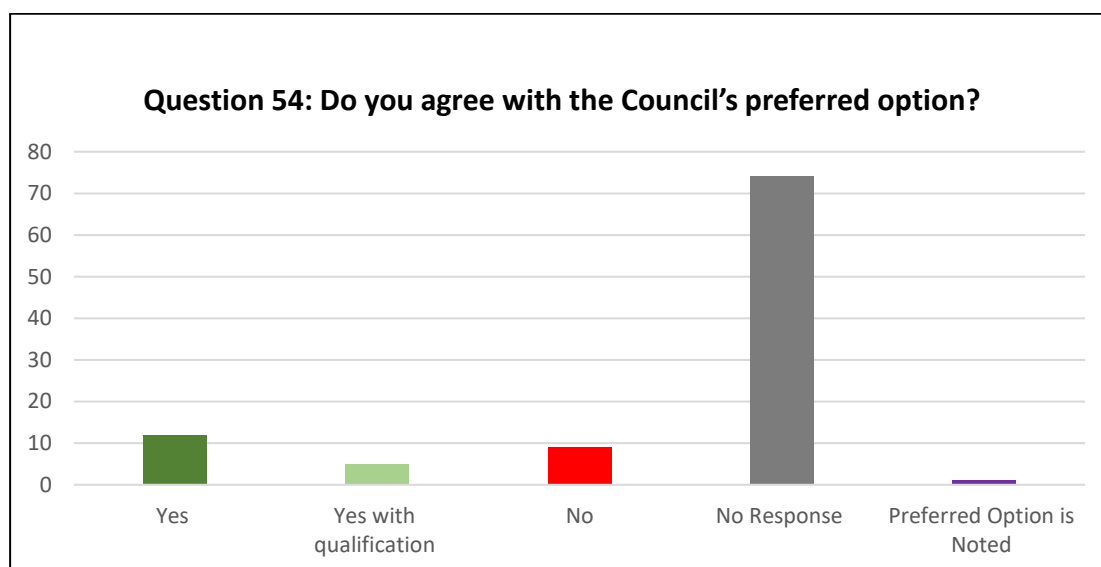
- Waterways Ireland in partnership with councils, tourismNI, SportNI and HIS have plans to support and promote development along the river corridor for recreational, commercial and tourism development projects. Each project should be assessed on its own merits e.g, marina and jetty development in flood plain areas. Option 2 may be overly restrictive for such schemes which will aim to bring social and economic development to the river corridor;
- Broadly supportive of preferred option. It is vital that flood alleviation measures are integrated in reducing the effect of extreme weather events such as floods, including riparian planting, strategic planting within the floodplain, native tree planting and woodland creation throughout the landscape to 'slow the flow' and improve water infiltration;
- Welcome any moves to reduce the risk of development, and especially people's homes, being located in areas at risk of flooding;
- Disagree with the preferred option and are content with the provisions set out in PPS15 whereby a proposed development meets the exceptions test and carries out a Flood Risk Assessment then this will be sufficient to determine the acceptability of a proposal in terms of the potential flood risks;
- Welcome the precautionary approach for the presumption against development in flood plains or where flooding may become exacerbated. Opportunity of how the character appraisal using the historic environment (and landscape), as part of the evidence base, can inform appropriate zoning, e.g. field patterns, drainage routes and so on to indicate floodplain areas no longer evident;
- Provisions set out in PPS15 whereby a proposed development meets the 'Exceptions Test' and carries out a Flood Risk Assessment then this will be sufficient to determine the acceptability of a proposal in terms of the potential flood risks;
- Flood Risk is not being taken seriously enough and more defensive work must be carried out by rivers agency, staff and machines alongside new builds avoiding flood risk areas;
- Welcome the proposal to strengthen the existing policy approach to ensure the precautionary principle is carried through to the LDP policies;
- This over precautionary stance is unwarranted and would lead to considerable uncertainty as to what is and what is not a floodplain. The correct approach is to identify the floodplain (river or sea), with a suitable climate change buffer, and development out with that designated area must be considered to be free from floodplain flooding risk. Moreover, the exceptions presently listed in Policy FLD 1 of PPS15 (Revised) for acceptable development within a floodplain, must also be retained;
- This option does not take account of the fact that some development may be appropriate in the floodplain. New development, through innovative design solutions, has the potential to alleviate problems of flooding of existing property and

infrastructure. For example, development land that lies partially in the floodplain can be made developable by land raising, if level for level compensatory flood storage is provided elsewhere (usually on the opposite bank). This established technique should not be ruled-out by a blanket ban. Tourism and water-based sport and recreational schemes may, by necessity, be located within or near floodplains but the risk can be assessed and managed by proven design solutions.

4.6.6 Flood Risk

Key Issue: FR2: Impact of Potential Future Flooding on New Development Outside of Existing Floodplains

Preferred Option (Option 1): Identify buffer strips (based on the Rivers Agency’s 2030 predictions) around existing identified floodplains and provide policy for the protection of these areas



Summary of Dfl’s Response:

- Note the preferred option goes further than the SPPS policy, in effect ‘future proofing’ development by identifying buffer strips around existing identified floodplains. Request that the Council ensures that this is informed by the 2080 Epoch and ongoing work to update flood risk information.

Summary of Other Responses:

- Each site should be assessed on merit and consideration should be given to the use of appropriate technical solutions to flooding/drainage issued;
- Not sure how these buffer strips would be defined outside of existing flood plains, in the absence of modelling carried out by Dfl Rivers. We would submit that it is better for LDPs to recognise and develop policy around defined flood plains as they evolve through time in response to evidence of flood risk. Also note that Dfl Rivers are now working to

the 2080 epoch and not 2030 predictions as stated. As this may take in additional land from flood maps based on the 2030 epoch, it is possible that some of the fringe lands that you may be considering as 'buffer land' may now be included in the flood plain. Even within the coastal flood plain, DfI Rivers advise that infilling will have a negligible effect on its extent and therefore much less likely (than riverine flood plains) to cause flooding elsewhere. DfI Rivers has stated that flood maps change and evolve over time, therefore it is likely that future revisions will take due account of areas currently outside existing flood plains that are likely to be impacted by development. Pending this we can only assume that the existing flood maps are sufficiently robust. It is also noted that the PO (in referring to "Allowing no further development") does not make any reference to 'exceptions' allowed through the existing policy as well as allowance for regionally significant development – all subject to satisfactory FRA. The J&A also states "this key issue" relates to policy applying outside of existing designated floodplains". Key Issue FR1 addresses development within flood plains, therefore this text seems somewhat confusing;

- Each development proposal outside the existing floodplains again should be assessed on its own merits or potential detrimental effects. Although a blanket approach allows greater control it also "throws the baby out with the bathwater" in relation to potentially beneficial and sustainable projects in such locations;
- Unplanted buffer strips are less effective at improving water management, flood alleviation and 'slowing the flow' than strategic riparian/tree planting (link to demonstration video is provided). To achieve best outcomes, flood alleviation measures must be implemented on a landscape scale, not just on flood plains and along water courses, although these are vital elements and will certainly produce positive results. In terms of a landscape scale approach, we would recommend that planting of native broadleaf woodland on lower upland areas and riparian zones with appropriate scrub species on the higher upland areas. The presence of these scrub species and native woodlands would create a natural mosaic while not encroaching on other priority habitats. The presence of trees at all levels would stabilise the soils, improve water filtration, and provide a buffer for falling rain (slowing the flow). Upland native woodland planting further down the slopes would hamper the impact of any landslides from the higher upland level, slowing the movement of material. Riparian planting along watercourses would add to this mitigation strategy reducing water, sediment (soils and rock deposited by landslides) and nutrient run-off in to the watercourses. Deforestation of the landscape will increase the impacts of both flooding and landslides, which often coincide during major weather events. The mitigating measure, which is low cost and high impact, is the planting of native trees in the right place as part of a strategic programme on a landscape scale;
- Welcome any moves to reduce the risk of development, and especially people's homes, being located in areas at risk of flooding;
- Disagree with the preferred option as this proposal could see a high proportion of land ruled out for development without any justification or evidence base to support such an approach;
- Welcome the precautionary approach for the presumption against development in flood plains or where flooding may become exacerbated. Opportunity of how the character

appraisal using the historic environment (and landscape), as part of the evidence base, can inform appropriate zoning, e.g. field patterns, drainage routes and so on to indicate floodplain areas no longer evident;

- As opposed to retaining the existing floodplain areas only and the existing policy framework, the preferred option is to identify buffer strips (based on the Rivers Agency's 2030 predictions, i.e. climate change) around existing identified floodplains and provide policy for the protection of these areas. This preferred option would apply a further precautionary principle to the existing policy framework, whereby no development would be permitted in identified buffer strips (based on Rivers Agency's 2030 predictions). This buffer area should also allow for the exceptions for acceptable development within a floodplain presently listed in Policy FLD 1 of PPS15 (Revised) to be retained. All other development would not be acceptable;
- Natural flooding has helped to give our landscape and countryside its unique character, and is vital to wetland wildlife. Flood and coastal management should be about protecting and enhancing the natural environment alongside protecting people and property from the damaging impacts of floods. Natural floodplains and natural watercourses should not be subject to development pressure, should be retained and restored as a form of flood alleviation and an important environmental and social resource. There should be an integrated approach to river and coastal management from defence and drainage towards the contribution to wider social, economic and environmental objectives set by Government, e.g. the potential to create new floodplains to hold water upstream to be released when the river can cope with the flow. Consideration should be given to the removal of strategically targeted flood banks, to allow the floodplain to function properly and manage the risk posed downstream. Land is transferred into periodical wetlands, may increase visitors and provides natural filtration of water. Those affected should receive ecosystem service payments. The council should develop a flood risk strategy and associated policies that prevents new development in areas known to be at risk of flooding or may increase flooding elsewhere, promote sustainable development through the retention and restoration of natural floodplains and watercourses and promote an integrated and sustainable approach to the management of development and flood risk. Re fluvial floodplains, there is a need to look at new approaches e.g better warning systems, more floodplain storage, tighter controls on building in floodplains and better land management. Fully support an overall presumption against development in river floodplains. The intensification of use of previously developed land could allow increased development in high flood risk areas with minimum flood defences where the risk is likely to increase in the future with climate change, resulting in the need for more hard flood defences, and the existing flood defences are already reducing the capacity of the flood plain to carry out its function. Suggest there should be a presumption against development of previously developed land within settlements limits even if the appropriate current minimum standard of flood defence has been met. The LDP should include a requirement for a Flood Risk Assessment, including the requirement when a site is close to the margins of the floodplain as depicted on the Strategic Flood Map and a more accurate definition of the extent of potential flooding is required. Content that the protection of flood defence and drainage infrastructure policy remains in the LDP,

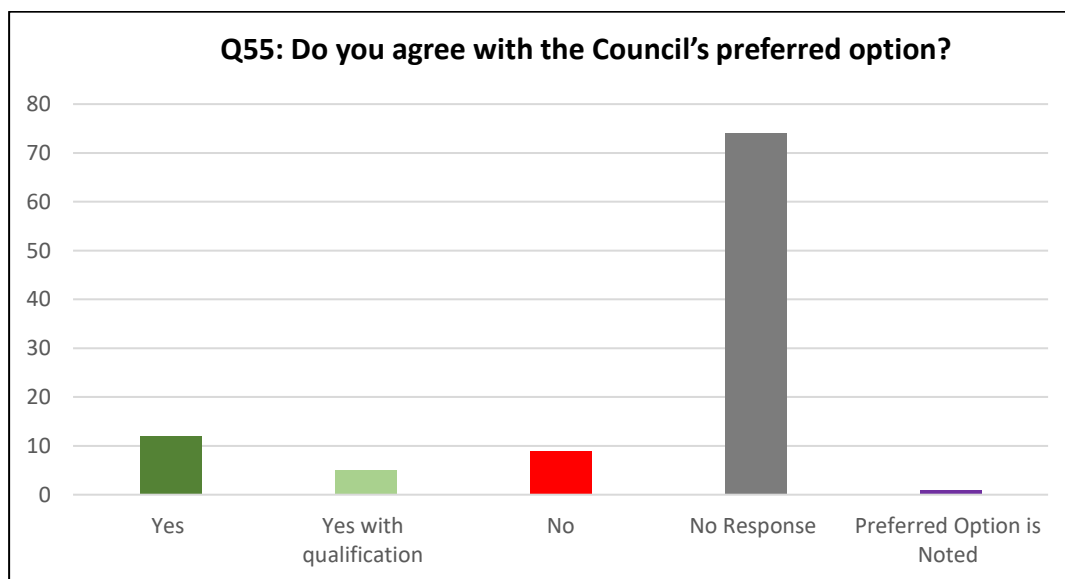
provided permission could still be given for development that would replace hard with soft flood defence mechanisms e.g. in certain cases to breach flood defences to allow flooding of low-lying land for managed retreat purposes, should this become necessary and appropriate in NI. With regard to development at surface water (pluvial) risk, given that peatlands are internationally recognised as important for water storage, hope that this is reflected in the assessment of plans to extract peat from lowland raised and blanket bogs in NI, and that the precautionary approach will be adopted. Where permission is granted, a planning agreement to facilitate long-term management re mitigation measures is required. Supports a continued general presumption against culverting and canalisation of watercourses as they can disrupt the connectivity and interaction between wetlands, riparian zones and rivers. Refer to response to Revised Draft Consultation on PPS 15 and Draft SPPS;

- The preferred option would place undue restrictions on innovative design solutions that may have the potential to alleviate problems of flooding of existing property and infrastructure.

4.6.7 Flood Risk

Key Issue: FR3: Promote the Use of Sustainable Drainage Systems (SuDS)

Preferred Option (Option 2): Provide policy on the use of SuDS for all development



Summary of DfI's Response:

- The Council is reminded that the use of SuDS can help to reduce pressure on the sewer network and may in effect increase capacity at overburdened Waste Water Treatment Works. Whilst encouraged by the Council's efforts to make progress in addressing this key issue, Council should satisfy itself that the appropriate processes are in place to make this option viable.

- DfI Roads - Noted that the preferred option is to provide a policy on the use of SuDS for all development. Suitable low lying locations for attenuation wet basins, ponds and wetlands should be zoned and available for use by all nearby developments. These attenuation areas can be an asset within the built environment if handled correctly as they will be green space available for recreation and could be linked by footway/cycle tracks.
- Housing density should be reduced to allow more space for filter strips or other SuDS. Maximum housing densities should be provided as a key site requirement on any zoned land. Maintenance companies should be responsible for maintenance of SuDS within site open spaces. A minimum maintenance standard document is required for open spaces and SuDS.
- Engineering solutions can be elegant and improve the built environment if they are given proper consideration at an early stage. The LDP would be the appropriate early stage.
- Water & Drainage Policy Division: Welcome the reference to the use of SuDS to help deliver effective drainage at source and reduce flood risk. The document also helpfully clarifies the benefits of SuDS in figures 5 & 6 which have been taken from the CIRIA SuDS manual.
- Key Issue FR3 (Page 115) proposes that SuDS should be used in all developments. This is a welcome step and goes beyond the current policy. Council should be mindful that there may be some developments where SuDS would not be the appropriate drainage solution i.e. due to ground conditions, topography or other factors. Current policy is that SuDS should be 'considered' in all developments and other methods of dealing with storm water should only be used if SuDS is not appropriate in the circumstances.
- Regional Planning & Policy Team: The principle of the preferred option is noted and welcomed. However, it should be noted that SuDS may not be an appropriate form of drainage for all development. Further advice and guidance should be sought from DfI Water and Drainage Policy Division.

Summary of Other Responses:

- Option 3 provides a more realistic approach to a range of development types as suds not always practical or possible in small scale developments;
- As far as possible, natural drainage systems should be incorporated in to all new developments, such as strategic native tree / hedgerow planting and the provision of other soft drainage measures such as green space with appropriate vegetation. It is important that the wider benefits of these green infrastructure interventions as soft drainage systems are recognised and valued. Increasing tree planting and green space provision within developments, both residential and economical, will improve air quality, provide shelter and shade, increase biodiversity, provide scenic amenity, and offer wildlife habitats as well as delivering the main water management service;
- Disagree with the preferred option as the proposal has the potential to add additional unnecessary costs to developments. Is not appropriate to expect all forms of development to include SuDS, as the existing drainage network may still have sufficient capacity to manage the run-off from new development. Consider Option 3 is more

appropriate where policy sets out which categories of development will be expected to incorporate SuDS. Recognises it might not be practical or feasible for certain types and scales of development to incorporate SuDS and provides additional certainty for developers;

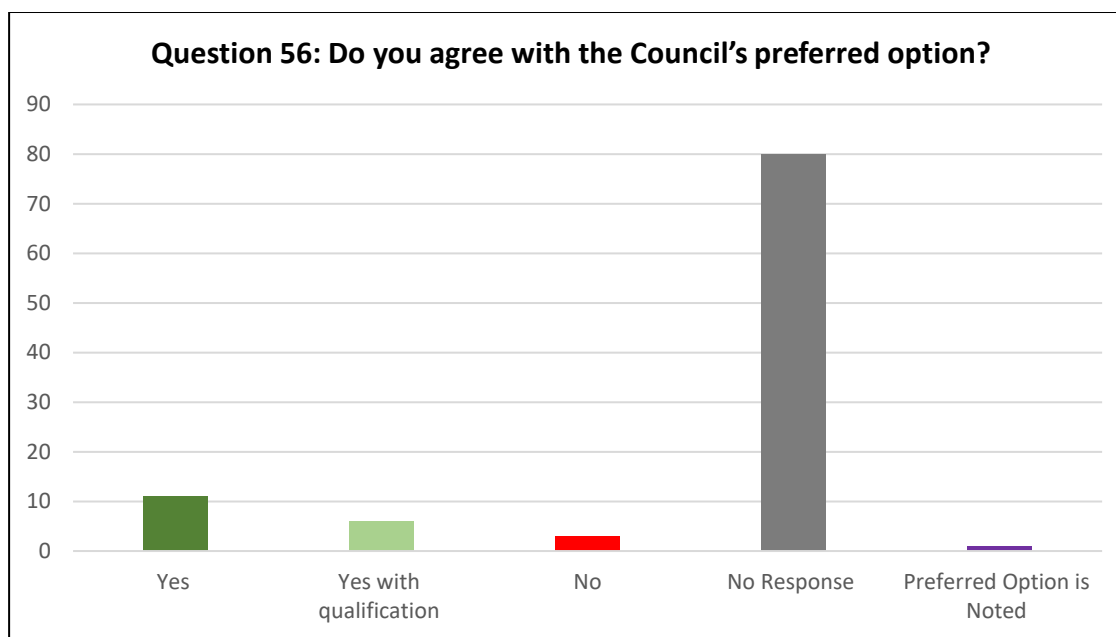
- Welcome the preferred option. Impact of SuDS on any archaeological sites, known or unknown, should be carefully considered, including on the presence of heritage assets, in relation to mitigation measures. Specifically, where water control measures including drainage and changes to hydrological conditions can adversely impact on waterlogged monuments such as crannogs and trackways, or where flood alleviation from developments into historic waterways such as canals can have an erosive and detrimental impact;
- NIEA Water Management Unit recommends that Sustainable Drainage Systems (SuDS) are incorporated, where appropriate, into the drainage design of all new developments for the environmental management of rainfall / surface water drainage. Temporary SuDS can also be used during the construction phase as pollution prevention measures for silt management and to prevent erosion. Where possible these should be retained or adapted as part of the final permanent site drainage solution. Surface water should be dealt with as close as possible to where it falls as rain (source control) and the use of two or more SuDS components can be used for the optimal solution to:
 - i) manage rainfall to mimic natural drainage by:
 - reducing runoff rates;
 - reducing additional runoff volumes and frequencies; and
 - encouraging natural groundwater recharge.
 - ii) minimise impacts on quantity and quality of runoff by:
 - reducing pollution and protecting the quality of receiving waters;
 - preventing direct discharge of spillage; and
 - reducing the volume of surface waste runoff to sewers.
 - iii) maximise amenity and biodiversity opportunity by:
 - contributing to the amenity and aesthetic value of the development; and
 - providing habitat for wildlife and biodiversity.The use of a number of SuDS components within a development such as swales and settlement ponds may enable the better management of ground water;
- Option 3 is adequate. Would not be reasonable to suddenly apply SuDS policy to all developments. The scale of developments in NI do not justify this;
- Sustainable approach to future new development;
- SuDS can be designed in as an integral part of any scale of development proposal. They can be particularly effective in managing surface water run-off in larger developments by providing drainage solutions that do not add pressure to the existing drainage network. This is a sustainable approach to future new development;
- SuDS should be promoted within all new developments along with retrofits to existing developments when assessments prove the need. Refer to response to Revised Draft Consultation on PPS 15 and Draft SPPS;
- While SuDS are useful in alleviating flooding and in water conservation generally, their application is not suited to all developments on all sites. There may not be space, ground conditions may not be suitable and there may be issues regarding future

adoption or management of SuDs installations. Each site should be assessed for suitability to adopt a SuDs approach on a site by site basis.

4.6.8 Flood Risk

Key Issue: FR4: Development in Proximity to Reservoirs

Preferred Option (Option 1): Identify the flood inundation areas of controlled reservoirs and retain the principle of the existing policy framework



Summary of Dfl's Response:

- Welcome the preferred approach which the Council considers would retain the existing provisions of the SPPS and PPS 15 (Revised) Planning and Flood Risk FLD5: Development in Proximity to Reservoirs. It is noted that the Council's justification however, does not appear to align with current policy direction. Council instead believes that the onus should no longer be on the applicant to prove reservoir safety in order to secure planning permission. Council is reminded that the rationale should be consistent and coherent with the wording of the preferred approach.
- Council should ensure that it works with the Department in seeking to apply a practical policy approach to this key issue.
- Water & Drainage Policy Division: Noted that the preferred option is Option 1. However, the commentary supporting this option differs from that outlined in Option 1 in that it advises that 'the onus should no longer be on the applicant to prove reservoir safety in order to secure planning permission'. Suggested that Council includes this as an additional option and then, should it score as the most sustainable overall in the Sustainability Appraisal, it should be made the preferred option.

- In doing so, Council should advise who will have responsibility for providing assurance on reservoir safety if ‘the onus should no longer be on the applicant to prove reservoir safety in order to secure planning permission.’ It cannot rely on NI Water providing this information because not all reservoirs in the area are the responsibility of NI Water. That said, the Department has agreed to provide applicants/Planning Authorities with information on the condition of reservoirs, where that is available, but the Department will not have this information on all reservoirs even after the Reservoirs Act has fully commenced.
- Regional Planning & Policy Team: The principle of the preferred option is noted. However, it may not be appropriate to identify flood inundation areas of controlled reservoirs for national security reasons. Further advice and guidance should be sought from DfI Rivers.
- Noted that the preferred option for this subject policy area has omitted to provide the preferred strategic direction on the approach to deal with other flood risk aspects such as ‘Protection of Flood Defence and Drainage Infrastructure’, and ‘Artificial Modification of Watercourse’.

Summary of Other Responses:

- Agree that the existing policy provisions of SPPS and FLD 5 should be retained, however not sure if flood inundation areas of controlled reservoirs would be published in the LDP due to the level of detail available for publishing and the possibility of this information changing over the Plan period. May be more appropriate for the LDP to signpost to DfI Rivers (rather than NI Water as the preferred option states) for the most up to date flood inundation areas at any particular point in time;
- Welcome the preferred option. Impact of SuDS on any archaeological sites, known or unknown, should be carefully considered, including on the presence of heritage assets, in relation to mitigation measures. Specifically, where water control measures including drainage and changes to hydrological conditions can adversely impact on waterlogged monuments such as crannogs and trackways, or where flood alleviation from developments into historic waterways such as canals can have an erosive and detrimental impact. Welcomes the preferred option and acknowledgment that vulnerable (sensitive) landscapes can be difficult to accommodate renewable energy proposals without a detrimental impact to heritage assets, welcome the inclusion of Areas of Constraint in a policy approach. Seek clarity on what criteria would be utilized in defining Areas of Constraint. In terms of the impact on the historic environment, the setting of a heritage asset is not only assessed from a visual impact, but rather applies to the ways in a heritage asset may be understood, seen, experienced and enjoyed. Need to consider the protection of the historic environment, as well as the settings of individual and linked or connected heritage assets, from inappropriately sited renewable energy developments. Renewable energy developments (wind, solar and hydro) have the potential to adversely impact on the historic landscape. Concerns regarding the cumulative impact of renewable energy sites and structures (including tall structures, solar fields, including associated infrastructure necessary and so on, e.g. roadways cable trenches) in the vicinity of heritage assets and the wider historic

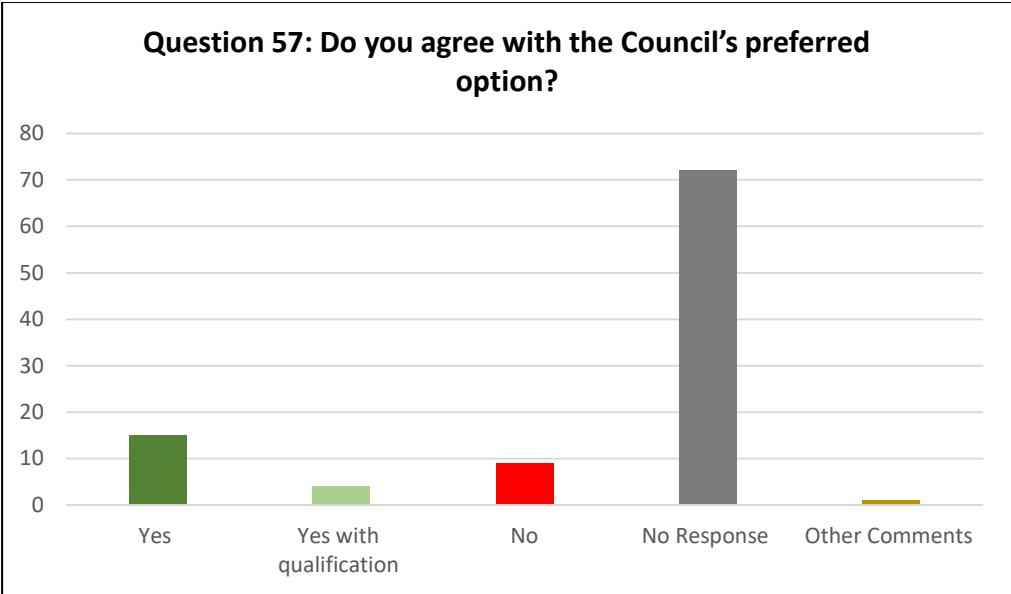
environment. It is important that the creation of Areas of Constraint do not create a perception that applications outside those areas that cause adverse impacts to heritage assets and their settings are somehow more acceptable. Highlight the importance of being in a position to demonstrate how the historic environment evidence has been taken into account toward informing appropriate zoning. Note comments in the justification for scoring in the SA Interim report as to the positive impact that these (and other) developments can have by way of leading to discovery and recording of archaeological remains. While discovery is positive, the destruction of the remains, albeit through recorded excavation, is a significant negative impact on the asset. Mitigation through recorded excavation should be referred to as mitigation or a measure to offset negative impact and the scoring should be adjusted (as elsewhere in the report) to reflect the negative impact.

- The strategic planting of native trees and hedgerows in the areas and landscape around reservoirs will significantly improve the water management process. This planting will improve the quality of water entering the reservoir and 'slow the flow' of water which increasing the landscape/reservoir resilience to heavy rainfall events. Planting around the reservoir will also provide shade which will reduce evaporation during periods of increased temperatures and improve water temperature stability which in turn supports biodiversity and recreational use. As with all water management processes, a landscape scale approach will provide best possible outcomes;
- Welcome any moves to reduce the risk of development, and especially people's homes, being located in areas at risk of flooding;
- On the issue of flooding, concerned that the Council has not brought forward the issue of coastal flooding, though it is mentioned in Para 6.227. Unfortunately Para 6.229 then states that climate change is not the primary cause of flooding, though in the case of coastal flooding, it clearly is the primary cause through sea level rise. Given that a considerable portion of the Council area is extremely vulnerable to coastal flooding as a result of projected sea level rise, it would be appropriate to take this into consideration along with other flood risks. This issue was not adequately addressed in PPS 15 Planning and Flood Risk or in the SPPS. The development of the LDP would provide an opportunity to rectify the serious gap in planning policy on coastal flooding;
- Planning in future must be climate change resilient;
- Agree with the preferred option but the comment that the onus should no longer be on the applicant to prove reservoir safety in order to secure planning permission should also apply to reservoirs that are not owned and/or controlled by NI Water but are privately owned;
- Recommends the retention of the SPPS policy. Refer to response to Revised Draft Consultation on PPS 15 and Draft SPPS.

4.6.9 Public Utilities

Key Issue: PU1: High Structures in Sensitive Landscapes

Preferred Option (Option 2): Identify specific areas within our most sensitive landscapes as Areas of Constraint on High Structures development



Summary of DfI's Response:

- Note the preferred option but would draw the Council's attention to the lack of detail in relation to the location of "critical areas" or potential height restrictions. Council should also consider that the SPPS directs that specific issues be addressed and specific requirements for telecommunications be separate from the subject policy area of other utilities in the LDP.
- Regional Planning & Policy Team: Note and welcome the preferred option.
- In addition, PPD would wish to make the following comments;
- Paragraph 6.246 'Airport public safety zones' it is unclear whether this is applicable to the borough or not? As further into this section paragraph 6.248 makes reference to the City of Derry airport lying just outside the Borough and affected by the flight path.
- Furthermore paragraph 6.248 (in relation to the aforementioned flightpath) is written in relation to Windfarm safeguarding – as such would this be better placed under 'Renewables' section. Similarly, Paragraph 6.250 refers to AONB's and wind turbines/windfarms and perhaps would be better under the renewables heading. Paragraphs 6.247 and 6.249 both related to powerlines and AONB's seem at odds and somewhat misleading.
- Finally, it is considered that there are mixed messages in relation to 'High Structures in Sensitive Landscapes' coming from Paragraph 6.247 "...should avoid areas of landscape sensitivity, including AONB's..." and Paragraph 6.254 "...the need to balance essential high structures and infrastructure with the protection of our landscapes...."

Summary of Other Responses:

- There should be more emphasis and allowance for transmission electricity infrastructure in this POP, it is not just about tall structures;
- Clearly, a degree of flexibility is required here and Option 2 seems to offer this;
- Given the distinctiveness and high value placed on the borough's natural environment for scenic, amenity, tourism value, and the fact that high structures are often not spatially dependent, we would oppose any unnecessary infrastructure that would have a detrimental impact upon the enjoyment of the natural environment. In relation to the placement of such infrastructure elements, given that they are not site dependent there is no reason why they should be located where they will cause damage or loss to important and sensitive habitats and sites, such as ancient or long-established woodland. Areas of ancient and long-established woodland should be protected from all and any development proposals. Given the biodiversity value and irreplaceable nature of the sites, as well as the vital heritage link they provide, they should not be offered up for short term financial gain. Ancient and long-established woodland must be afforded the increased protection in relation to renewable energy development;
- It is acknowledged that individual councils will develop their own policies to address issues whilst ensuring they do not conflict with the policies of neighbouring council;
- Whilst the Sperrins Forum has considered renewables policies and high structures in our adjoining areas of the AONB, further co-operation is required including agreed joint mapping of wind turbines in particular. It has also been agreed to share information and consideration of our respective Landscape Character Assessment studies;
- The council considers the Sperrin AONB as an important shared landscape that is particularly susceptible to the potential adverse visual impacts of wind turbines and high structures. We would welcome the opportunity to continue to work with yourselves to ensure such protective designations in relation to renewables are contiguous across the council boundaries;
- Query the relevance of Section 6.250 to this section. Wish to highlight the language associated with turbine and windfarm development could be perceived as negative. Welcome reference to electricity infrastructure being crucial to the economy and to residents and visitors to the Borough. Highlight that energy generation, in particular renewable, is also critical to the NI economy and will continue to play a critical role in the future and should be recognised in the POP. The preferred option will introduce another spatial designation limiting development. Query how this will be applied. How will sensitive landscapes be selected? How will high structures be defined and how will this designation relate to others. It is difficult to provide a detailed response in the absence of this information. This could lead to the sterilisation of renewables deployment in areas which otherwise would be suitable under the SPPS, contrary to its objectives;
- Clearly a degree of flexibility is required here and option 2 seems to offer this;
- Welcome the preferred option and acknowledgment that vulnerable (sensitive) landscapes can be difficult to accommodate renewable energy proposals without a detrimental impact to heritage assets, welcome the inclusion of Areas of Constraint in a policy approach. Seek clarity on what criteria would be utilised in defining Areas of

Constraint. In terms of the impact on the historic environment, the setting of a heritage asset is not only assessed from a visual impact, but rather applies to the ways in a heritage asset may be understood, seen, experienced and enjoyed. Need to consider the protection of the historic environment, as well as the settings of individual and linked or connected heritage assets, from inappropriately sited renewable energy developments. Renewable energy developments (wind, solar and hydro) have the potential to adversely impact on the historic landscape. Concerns regarding the cumulative impact of renewable energy sites and structures (including tall structures, solar fields, including associated infrastructure necessary and so on, e.g. roadways cable trenches) in the vicinity of heritage assets and the wider historic environment. Is important that the creation of Areas of Constraint do not create a perception that applications outside those areas that cause adverse impacts to heritage assets and their settings are somehow more acceptable. Highlight the importance of being in a position to demonstrate how the historic environment evidence has been taken into account toward informing appropriate zoning. Note comments in the justification for scoring in the SA Interim report as to the positive impact that these (and other) developments can have by way of leading to discovery and recording of archaeological remains. While discovery is positive, the destruction of the remains, albeit through recorded excavation, is a significant negative impact on the asset. Mitigation though recorded excavation should be referred to as mitigation or a measure to offset negative impact and the scoring should be adjusted (as elsewhere in the report) to reflect the negative impact;

- SONI agrees with the Preferred Option 2 and the council's approach to essential infrastructure project that will support economic and social development. The SPPS advice on avoiding areas of landscape sensitivity, including AONBs does not recognise the need for high structures in the countryside. SONI supports and understands the principle underlying the SPPS and will always seek to comply. However, it may not always be possible to avoid AONBs because of the nature of generation (i.e. wind farms) and demand (i.e. settlements) locations. SONI carefully plans its routes and sites for new transmission grid infrastructure based on a careful consideration of a wide range of issues. The final route for any line is a carefully considered balance of technical, environmental and landowner considerations. Where it is not possible to avoid an AONB (or other sensitive sites/areas), SONI will always document reasons for same. Preferred Option 2 will ensure that all location options, excluding the most sensitive, are considered in the development of new infrastructure, each having due regard for the particular receiving environment. It should be noted that many of the existing transmission lines already travel through AONBs and any proposal for works for the purpose of repairing and renewing these lines in AONBs should be supported in policy to ensure the secure and reliable supply of electricity across the borough and NI;
- Public utilities must get back to a fully council staffed work force with the equipment to suit;
- No consideration has been given to electricity supply (see supporting information relating to Renewable Energy Targets and Benefits of Renewable Energy submitted by RES which provides a more detailed response);

- The WHS SG supports adoption of Option 2 and requests a definition of what is meant by 'high structures' be included as currently this is open to interpretation. Clarification was provided at the meeting that the definition of high structures was to include telecommunication masts and electricity pylons. The SG agreed that the WHS and its Distinctive Setting should be included in such an area of constraint, and consideration should be given to both the views from the WHS, and those on the approach to the WHS through the Distinctive Setting;
- Welcome the preferred option to identify Areas of Constraint on High Structures within our most sensitive landscapes. As above, the landscape quality and high sensitivity of the AONBs and the Distinctive Landscape Setting of the World Heritage Site mean these areas are of particular concern and need protection from all forms of development;
- Definition of high structures required as currently this is open to interpretation. Believe that the Local Development Plan should be developed in line with Causeway Coast and Glens Heritage Trust Renewable Energy Position Statement 2012. CCGHT is committed to adopting a positive approach to the development of renewable energy in the Causeway Coast & Glens, whilst at the same time seeking to protect and raise awareness of the special qualities of the natural heritage and scenic landscape of the 3 AONB'S. CCGHT recognises:
 - the need to reduce energy use and improve energy efficiency & conservation;
 - the need to reduce dependence on fossil fuels and to generate a more sustainable energy supply; and
 - That some renewable energy developments can bring valuable benefits to the economy of the AONB's.

On the basis, sensitively site renewable energy installations, which pay due regard to the high-quality landscape of the AONB's may be acceptable where:

 - impacts are clearly demonstrated to be local in scale;
 - adequate mitigation measures can be put in place;
 - net environmental gain can be demonstrated.

Larger scale renewable energy developments which have an intrusive impact on the landscape of the AONB's, by virtue of their size, visual dominance, ancillary infrastructure and other characteristics are likely to be incompatible with the AONB designation;
- Strongly opposed to the preferred option as it will be unduly restrictive to renewable energy developments. The introduction of a spatial approach with a series of landscape designations, protection zones, restricted heights and buffer zones as proposed, will serve to essentially sterilise any potential development opportunities in the Borough. Decisions on renewable projects should be made on a case by case basis. Any move towards a spatial approach must be evidence based and consistent. It is unclear how the proposed landscape character assessment will relate to the existing 2000 LCA series, or if there will be a co-ordinated approach with other councils. There is a need for regional direction/co-ordination on this matter. Renewable energy is consistently presented in negative language in the POP with no acknowledgement of its environmental, economic and social benefits and positive contributions. Query how reference to wind farm development is relevant to telecommunications and other public utilities. The POP acknowledges the critical role of electricity but fails to

acknowledge that of renewable energy in contributing to both electricity generation and security of supply. Fails to acknowledge that a greater proportion of NI's energy consumption now comes from renewable energy sources, in particular wind. The role of renewables in tackling climate change, assisting in meeting renewable energy targets, reducing carbon footprint and bringing local jobs and investment to the Borough should be acknowledged. Renewable energy technology is a rapidly evolving industry changing in arrangement and effectiveness. The LDP should retain flexibility in enabling a diverse range and scale of such generation and storage over the lifetime of the plan;

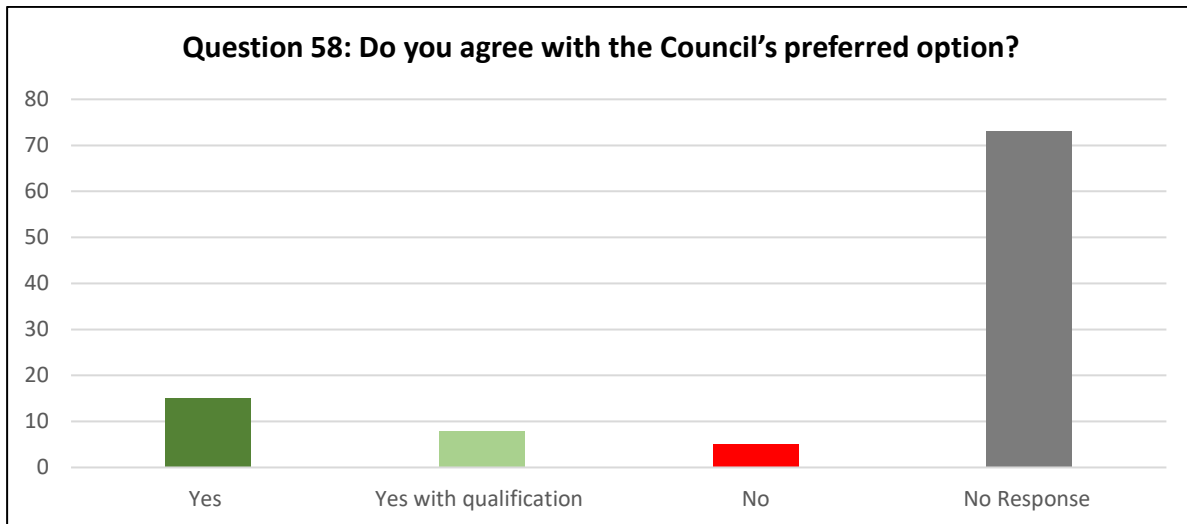
- Recommend a linked-up and co-ordinated approach to addressing strategic infrastructure issues in the Borough as this should assist in achieving sustainable forms of development, e.g inappropriately located power lines can pose a risk to not only the area's scenery, but the ability to sustainably restore, e.g our wetland landscape for nature and for tourism and recreational economic benefit. As part of the integrated approach which the LDP is seeking to advocate, early dialogue with other utility providers could lead to a co-ordinated effort in areas where infrastructure is proposed, thereby helping transform the area and its natural heritage / tourism potential for the future. Sensitive landscapes must include reference to species and habitats; and
- There is no need for more restrictive policies within the AONBs. Further arbitrary restrictions could result in increased pressure and degradation of the remaining, non-designated countryside. Each proposal should be treated on its merits;
- Welcomes the preferred option and acknowledgment that vulnerable (sensitive) landscapes can be difficult to accommodate renewable energy proposals without a detrimental impact to heritage assets, welcome the inclusion of Areas of Constraint in a policy approach. Seek clarity on what criteria would be utilized in defining Areas of Constraint. In terms of the impact on the historic environment, the setting of a heritage asset is not only assessed from a visual impact, but rather applies to the ways in a heritage asset may be understood, seen, experienced and enjoyed. Need to consider the protection of the historic environment, as well as the settings of individual and linked or connected heritage assets, from inappropriately sited renewable energy developments. Renewable energy developments (wind, solar and hydro) have the potential to adversely impact on the historic landscape. Concerns regarding the cumulative impact of renewable energy sites and structures (including tall structures, solar fields, including associated infrastructure necessary and so on, e.g. roadways cable trenches) in the vicinity of heritage assets and the wider historic environment. Is important that the creation of Areas of Constraint do not create a perception that applications outside those areas that cause adverse impacts to heritage assets and their settings are somehow more acceptable. Highlight the importance of being in a position to demonstrate how the historic environment evidence has been taken into account toward informing appropriate zoning. Note comments in the justification for scoring in the SA Interim report as to the positive impact that these (and other) developments can have by way of leading to discovery and recording of archaeological remains. While discovery is positive, the destruction of the remains, albeit through recorded excavation, is a significant negative impact on the asset. Mitigation though recorded excavation should be referred to as mitigation or a measure to offset negative impact

and the scoring should be adjusted (as elsewhere in the report) to reflect the negative impact.

4.6.10 Developer Contributions

Key Issue: DC1: Developer Contributions

Preferred Option (Option 1): Seek developer contributions on appropriate types and scale of development



Summary of Dfl's Response:

- Encourage the use of developer contributions where these are required to facilitate a development proposal. Section 76 agreements are most frequently used to secure contributions. Such agreements may only be sought where benefit pursued is related to the development and necessary to the grant of planning permission.
- The Department's Development Management Practice Note 21 on Section 76 Planning Agreements advises that the Plan should be the starting point at which consideration of the potential need for and use of planning agreements begins. The inclusion of policies in the use of planning agreements in the LDP provides an opportunity to clarify at the earliest stage the expected nature, scope and levels of contributions that may be sought from developers.
- Dfl Roads - Northern Division: Certainty of size of any developer contribution is very appealing but will be very hard to determine due to inflation and possible cost overruns on infrastructure projects. Developers may try to keep any developments below the threshold size to avoid paying. Due to the cost of the required infrastructure all developments / developers should be contributing.
- There may well be need for both a fixed contribution for each unit built plus site specific requirements for infrastructure projects to be operational before lands are available for development.

- Certain projects which abut development land should be available to be constructed by developers if they wish to advance their project timescale. These schemes would be wholly required to facilitate their development. Strict project phasing and completion dates would have to be established before allowing an infrastructure project to be undertaken by a developer.
- It will be important that all schemes to be funded are listed and ranked in order of delivery. Developers will wish to know when schemes important to their lands are due for construction. Delivery of schemes can be seen and advertised as milestones for the plan showing that economic growth is happening as promised.
- Water & Drainage Policy Division: For further consideration - Potential for the Council to consider maintenance of soft SuDS systems with developer contributing towards the long-term maintenance. This could be achieved by payment from the developer of an upfront sum to the council to undertake future maintenance.
- Regional Planning & Policy Team: The preferred option (DC1) for developer contributions is consistent with the SPPS and the appropriate mechanism needed to deliver contributions such as planning agreements for infrastructure works (as contained within Article 122 of the Roads (NI) Order 1993) has been highlighted.

Summary of Other Responses:

- Planning applications should be refused where developers refuse to contribute appropriately to the improvement of local infrastructure, facilities and ambience. Such improvements do not always have to be practical, but may have a community aesthetic need;
- It should be noted that there are concerns about the viability of seeking Developer Contributions in the current economic climate, particularly in areas outside of the greater Belfast area;
- Option 2 facilitates a case by case assessment and seems to be a more balanced approach in relation to development opportunities along the Lower Bann corridor and throughout the borough;
- We support developer contributions. With regard to the provision of recreation or open/green space as part of the development, developers should be required to integrate green infrastructure elements such as native tree planting to ensure best possible outcomes and support the sustainability of the site. Advice from the Council's biodiversity officer (or equivalent skilled professional) should inform the provision of this recreational or green space to ensure sensitive and important habitats are not damaged and there is no loss of biodiversity as a result of this provision;
- Further clarification should be provided on the thresholds being considered by the council. Wind energy development should be considered as essential infrastructure and should be immune to developer contributions;
- It is however requested that the requirement for disabled access is integral to the policy setting when contributions are sought;
- Accepts there can be a logic to developer contributions but only in a context where such contributions can be included as part of the planning gain provided by a development, they are not used to replace/compensate for provision that should be provided by the

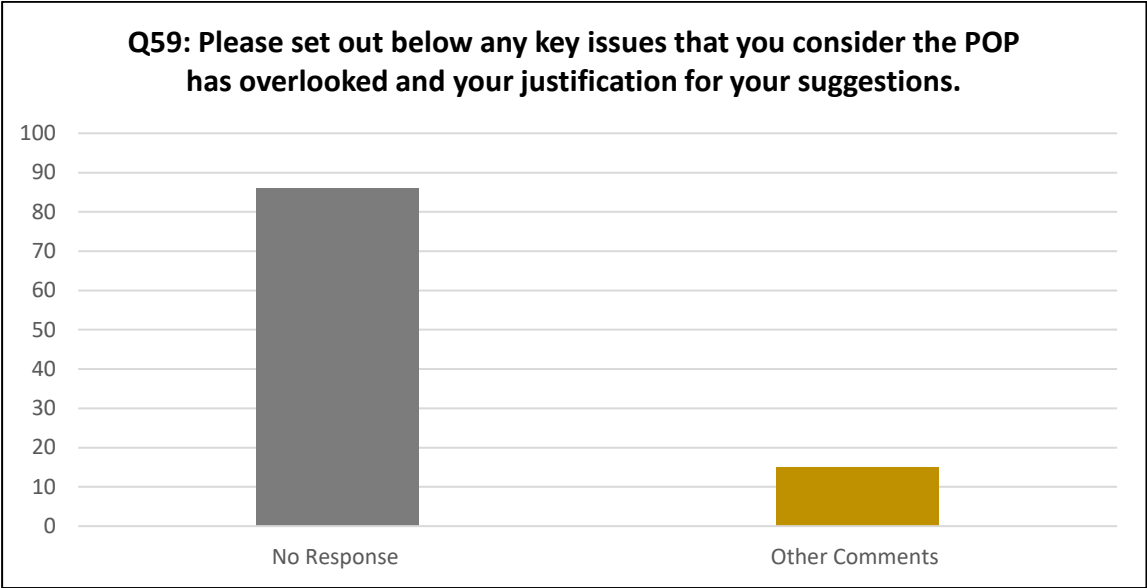
public sector, and complementary public sector provision which is needed to make a scheme/project/development work to best effect is equally pursued/ensured by the council;

- Generally support the preferred option. However, remind the council that, in instances where developer contributions are sought, that these are clearly defined particularly if contributions are to include an offsite provision such as infrastructural works or improved community infrastructure;
- Developer Contributions could create opportunities for the promotion and interpretation of the historic environment, and offer important opportunities to facilitate interpretation of archaeological investigation and mitigation, and of heritage assets, (they may be factored in through appropriate key site requirements at Plan Strategy stage). This will ensure alignment with the direction of SPPS. Archaeological remains are often encountered during the course of development, previously unknown remains can be difficult to identify in advance). Contributions to mitigation works are achieved through planning conditions. Potential that developer contributions could have with regard to the historic environment: in adding interpretation and meaning to places, allowing sensitive re-use of historic structures, in interpreting archaeology that was perhaps removed during the course of development, or potentially through encouraging the engagement of the public, e.g. through viewing windows or open days while areas of archaeology are being explored (e.g. in large towns like Coleraine or Limavady);
- Developers avoided making social/affordable housing contributions by breaking down his application into batches - this should be stopped. Though there is a limit on the life of a planning permission consideration might usefully be given to imposing a completion time scale along with the permission to avoid further examples of abandoned building sites;
- Developers contributions should also be sought to prime the requirement for enhanced public transport use or infrastructure such as bus shelters. Settlements should be considered only in areas where there is sufficient services to accommodate the development otherwise developer contributions should be sought to provide the necessary services;
- Developer contributions take our impartiality and therefore risk environmental damage;
- Option 3 is preferable. Important matter which should be subject to regional assessment and guidance, rather than LDP policies. A Borough specific policy could inhibit potential economic and housing development in the Borough. Necessary infrastructure improvements can be secured, where essential, on a site specific basis;
- Many examples in the UK where such schemes exist and produce extremely good results. The recipient can be the local school, local playpark etc;
- Option one is Council's preferred option, which is in line with the SPPS (paragraph 5.69, page 35, SPPS), which states that planning authorities can require developers to bear the costs of work required to facilitate their development proposals. Hence, option three is unrealistic. Option two does not pre-define the type and scale of development, and hence, will not provide clarity for developers and will lead to confuse, uncertainty and challenges. Agreeable to option 1 being pursued in the interest of providing

certainty at an early stage regarding the expected nature, scope and levels of contributions that may be sought from developers;

- Agree with the preferred option as this will provide certainty at an early stage regarding the expected nature, scope and levels of contributions that may be sought from developers; and
- Concerned that any use of thresholds to solely clarify when developer contributions are required, including the anticipated level of contribution and any exemptions if necessary, could result in situations where developments (under the threshold, and therefore not subject to the contribution requirement) could create deficiencies in, or add to existing problems, with regard to infrastructure needed to serve the development. They could also potentially result or contribute to the intentional promotion of piecemeal development so as to avoid 'hitting the developer contribution threshold'. Furthermore, including the anticipated level of contribution is suggested to be a high-risk approach as prices could vary substantially as a result of unexpected market forces and there could be situations where developer contributions do not meet the necessary costs. There would need to be some form of index linkage to avoid such situations, if it were to be progressed further. The existing SPPS context, alongside the identification of sites within the LPP (including Key Site Requirements) should provide a sufficient degree of clarity without creating unnecessary exposure to the risk of potential inadequate developer contributions. Caution should be exercised with regards to the wording of Developer Contributions, it must be clear so as to avoid an interpretation that planning permission can be bought or sold - reference to case law.

4.7 KEY ISSUES NOT ADDRESSED IN THE POP



Summary of Dfl’s Response:

- Some questions assume a degree of planning knowledge, which may not be the case.
- Acknowledgement of importance of second homes in the Council area welcomed, however, ownership information appears to date back to 2001. Reminded of need for up-to-date evidence to underpin LDP policy approaches. No policy options presented on Second Homes. Reminded of SPPS requirement for LDPs to zone land/include policy, as appropriate, to reflect local demand.
- The Council’s Position Paper 3 largely comprises summaries of third party reports with little analysis linking it to the outcomes of the commissioned Retail and Leisure Capacity Study and Public and Business Perception Study (this extensive research is welcomed).
- Welcome Map 3 illustrating both the environmental designations and locations of existing minerals workings/quarries - helpful in understanding the viability of the mineral resource and the impact of protective designations.
- A Borough-wide Pressure Analysis Map containing information on housing and other forms of development (in addition to renewable energy) would have been beneficial in illustrating development pressure generally.
- Further work is to be undertaken re: coastal issues in relation to settlement boundaries, minerals development, ports and harbours, natural heritage and environmental designations. Given the Borough’s extensive 240km coastline, coastal erosion and land instability are important issues.
- Current information available on the Coast issue is high level. Further work is being taken forward by the Coastal Forum which when completed, will assist in the formulation of policies and proposals. Useful information however, already exists on the extent of coastal erosion and coastal flooding, the location of natural and heritage assets including priority habitats, coastal settlement limits, harbours and ports and public access points along the coast as well as marine conservation zones. Indeed, much of this information is included within the Council’s various discussion papers.

Accordingly, this coastal information could have been collated and presented spatially as a basis for the generation of options.

- The recognition of need for cross boundary working with other councils and relevant bodies in relation to coastal development and the marine environment is laudable. Should be mindful of link between coastal issues and climate change moving forward.
- Note the Borough is home to Northern Ireland's only inhabited island. Welcome engagement with key community representatives on the island and acknowledge role the Council has played in implementing the Rathlin Island Action Plan 2016-20 of which CGGBC is a key stakeholder. No reference is made to the NI Executive's Rathlin Island Policy in this or subsequent sections. Its purpose is to develop a vibrant healthy community and increase the involvement of islanders in the development of policies and projects which improve the conditions for all the people of the island while protecting its environment. Critically, Council will be aware that "policies developed for this purpose may differ from policies applying elsewhere, in recognition of the unique circumstances of Rathlin Island and the challenges of island life". Whilst no options have been considered for Rathlin, the Council should continue to liaise with those who live and work on the island to ensure that their needs are considered in the LDP process.
- Welcome references to Northern Ireland Climate Change Adaptation Programme and Climate Change Risk Assessment 2017 Evidence Report. While no specific options are presented to address the issue of climate change, it is accepted that some of the policy options selected in the POP may further sustainable development goals by mitigating and adapting to climate change in line with paragraph 3.10 of the SPPS.
- The Local Transport Plan should clearly influence the LDP Plan Strategy. Given the linkage between the two plan processes, early and ongoing engagement with DfI Transport is vital to the formulation of robust planning policy. Work on the Regional Strategic Transport Network Transport Plan (RSTNTP) is underway, whilst plans are in place to procure consultants for the preparation of a Causeway Coast and Glens Local Transport Plan.
- In relation to renewable energy, the background papers contain useful information, some of which is quite detailed, in relation to balancing renewable energy development in appropriate locations. This may have assisted in teasing out some spatial options.
- Note that there are no specific preferred options for telecommunications, waste and water management, wind turbines, airport public safety zones, seaport development and power lines. Further clarification from the Council would be helpful.
- Note inclusion of a number of strategic objectives protecting Areas of High Scenic Value from inappropriate development and facilitating the upgrade/improvement of broadband services throughout the Borough. However lacks objectives which place similar importance on facilitating power, water, and sewerage and telecommunications infrastructure. The Council should provide background and clarification to its approach.
- Note the brief mention in paragraph 4.18 to Project Kelvin, making the region the optimal communications point for North American and Pan-European markets. The Council should consider relationship between telecommunications and its policies for economic development, industry and commerce.
- DfI Roads: DfI will be offering some consideration in its guidance document on filling stations on the main road network, similar to IC15.

- TPMU: Social Objective (h) - Department has provided Council with Accessibility Analyses so that the council can attempt to ensure that future development is in locations that are accessible. It is suggested that this objective should be amended to reflect the importance of accessibility – and the potential role that Accessibility Analyses can play in reducing the need to travel by private car.
- TPMU: Paragraph 6.29 appears to be have been repeated from earlier in the document. Is this necessary?
- TPMU: Paragraph 6.37 - Welcome reference to increase density where there is 'high accessibility to public transport facilities'. Will Accessibility Analyses be used to make this assessment? If not, how do the Council proposed to access Public Transport accessibility?
- TPMU: The data and accessibility analyses provided were not used. Should be used to ensure land-use and transport properly integrated at Plan Strategy stage. Should also acknowledge forthcoming transport plans and provide protection for the transport initiatives/schemes contained within.
- 6.218 is repeated (from 6.127).
- Note that 6.219 states that outcomes from the POP Public Consultation will inform the LDPs Car Parking Strategy – what input is the Council expecting in relation to car parking? It appears that the only question that has been posed in relation to car parking is Q.50 (tourism).
- Water & Drainage Policy Division: POP helpfully sets out the 'Regional Context' and welcome the inclusion of Sustainable Water - A Long-Term Water Strategy for Northern Ireland (2015-2040). The Strategy provides a framework for our future water needs and is an important policy consideration. There are several Policies and Actions which relate specifically to planning authorities' Local Development Plans:
- DW 2A (ii) Consider improved mechanisms to ensure that NI Water and Planning Authorities effectively integrate water investment and development plans and ensure customers' water needs are efficiently met in the future.
- FRMD Policy 1A - To ensure land-use planning decisions are informed to help minimise flood risk.
- FRMD 1A (i) Prevent inappropriate development in high risk areas and ensure that future development does not increase flood risk.
- FRMD 1A (ii) Land-Use planning decisions must continue to be informed by up-to-date information on the risk from all significant sources of flooding.
- FRMD 1A (iii) Any exceptional development permitted within high flood risk areas must make provision for adequate mitigation measures commensurate with flood risk to the development and elsewhere as a result of it.
- FRMD Policy 1B - Make space for surface water management in development plans.
- FRMD 1B (i) Engage with Councils on developing guidance on how development proposals (including land use zonings in LDPs) can incorporate large surface water drainage schemes.
- EP 3B (v) Future development plan zonings should make provision for both wastewater treatment facilities and sustainable drainage systems (FRMD Policy 1B).

- EP 3B (vi) NI Water to work with the Planning Authority (Councils) to complete studies (during PC15) to determine locations where new/upgraded WWTWs are needed to help ensure this does not prohibit economic growth.
- Consideration should be given to the policy implications of Sustainable Water - A Long Term Water Strategy (LTWS) 2015-2040.
- LTWS sets out a clear framework for action which will facilitate implementation of a range of initiatives aimed at delivering the long-term vision to have a sustainable water sector in Northern Ireland. This includes encouraging a sustainable approach to managing all our different water needs in a way which promotes regional development, without compromising the environment or increased flood risk. In particular the Strategy focuses on:
 - Drinking Water Supply & Demand;
 - Flood Risk Management and Drainage;
 - Environmental Protection and Improvement; and
 - Water & Sewerage Services.
- Retailing and Town Centres: LTWS supports economic growth towards a modern and sustainable infrastructure. Adequate water, sewerage and drainage infrastructure needs to be in place to facilitate retail development and attract inward investment to the area.
- Green areas within the towns can be used for urban sustainable drainage systems and to promote cohesion by providing shared open spaces.
- Urban design to include sustainable drainage in regeneration or public realm schemes, where appropriate.
- Blue green infrastructure can contribute to making your area a world class visitor destination, whilst contributing to sustainable drainage and promoting good health and wellbeing.
- Tourism: Wastewater treatment capacity should be a key consideration when considering new infrastructure associated with tourism development.
- Development in the Countryside: Over-development in the countryside can adversely affect water quality in rivers from the increased use of non-mains sewerage systems.
- Coastal Development: A baseline study and gap analysis of coastal erosion risk is currently progressing and a report is expected during 2018². This work will inform consideration of future policy in this area. It should be stated within the LDP that, going forward, there will be alignment with any central policy emerging on the management of coastal change.
- Climate Change: LTWS references how Climate Change is likely to have an impact on the weather and may result in more extreme weather in the future, causing more widespread flooding. Chapter 3 of LTWS relates to Flood Risk Management and it is important that the Council reflects these policies in the LDP.
- The Department welcomes the inclusion LTWS in section 6.232 of the POP.

² Published January 2019.

- Development in Proximity to Reservoirs: Paragraph 6.242 – The word ‘current’ should be removed from the first sentence as this suggests that the DfI Planning Policy in respect of development in the proximity to controlled reservoirs is about to change, when it isn’t. DfI also recognises the erratum which removed the incomplete sentence at the end of this paragraph in the initial publication of the POP.
- Flood Risk Table FR4 (Justification paragraph) - in the first sentence, replace NI Water with DfI Rivers.
- Also, this advises that ‘given that the information is now more readily available and the majority of the reservoirs are under the control and management of NI Water, the onus should no longer be on the applicant to prove reservoir safety in order to secure planning permission.’
- Waste and Water Management: Paragraph 6.261 – reword last sentence to read ‘and will serve the area for future years’.
- Appendix 1 – does not mention Sustainable Water – A the Long Term Water Strategy. Please include.
- Appendix 2 – Please remove ‘NI Regional Water Strategy 2016’
- Legislation – Please include ‘Water & Sewerage Services (Northern Ireland) Order 2006
- Regional Planning & Policy Team: Considered that the preferred options RT3 - RT7 appropriately reflect the strategic direction to retailing and town centres as set out in the SPPS.
- Regional Planning & Policy Team: Although Coastal Development is discussed in the POP at paras 6.187 – 6.197, it is noted that there are no options provided nor a preferred approach outlined as to how coastal development will be dealt with. Given the plan area has some 240km of coastline, liked to have seen more detail in respect to the strategic direction the council intends to take.
- Regional Planning & Policy Team: With regards Key Issue FR2, it should be noted that DfI Rivers are in the process of preparing revised flood maps with an epoch date of 2080.
- Regional Planning & Policy Team: Rathlin Island Policy not mentioned in Appendix 2.
- Regional Planning & Policy Team: Although Waste Management is discussed in the POP on pages 123 & 124, there does not appear to be a preferred approach on how Waste Management will be dealt with.
- Regional Planning & Policy Team: Coastal Development is discussed at paras 6.187 – 6.197, however it is noted that there are no options provided nor a preferred approach outlined as to how this issue will be dealt with.

Summary of Other Responses:

- Little options relating to power lines. Projects would be much more efficient and better consulted on if the constraints and policies were well defined. Transmission network is crucial to the operation of the country and the negative attitude to overhead power lines, and the fact that the planning policy for overhead lines is not well defined and understood, makes progressing through electrical infrastructure project very difficult;
- The bypass and Dual carriageway between Dungiven and Derry-Londonderry is a major construction in the council area in the past 10 years;

- The Plan has attempted to gather basic evidence however much of this evidence dates back to 2014 and is incomplete. Existing, active quarries have been omitted from the data presented and therefore the overall assessment of existing reserves, mineral activity and economic contributions is flawed. The information presented is based largely on data which has been provided by GSNI, NI Census and historical ROMPS information from DoE. We note that some additional data has been provided by QPANI but we would highlight that QPANI does not represent all quarry operators. Also, we are not aware of any direct engagement/consultation between the Council and individual operators within the Borough. This consultation should have taken place before the publication of the POP. Therefore, before any areas of mineral constraint are proposed, we respectfully suggest that a much more detailed assessment of approved reserves and market demand is undertaken. To assist with this, we would be happy to provide mineral output/reserve figures for our own operating sites if requested;
- Little reference to young people but we in general agree to all the preferred options;
- What consideration will be given to such documents as e.g. the existing Village Plans in future planning? Community Associations have worked hard to produce them, after all. If they are to be disregarded in future planning this would constitute a gross insult to those involved and a waste of resources;
- Discussion would be welcome regarding Craig's Moss which straddles MEA and CC&G council boundaries with a view to a balanced strategic approach to peat extraction. DfE also encourage protection of Platinum Group Minerals (PGM) as they are on the EU critical minerals list and advise that there should be a policy that councils don't have a presumption against exploration. GSNI are happy with the current policy but want councils to reflect an enabling approach. As some of the existing DETI mineral prospecting licences again straddle the council boundaries, discussion would be appreciated on this topic;
- There is very little mention of river corridors and in particular the Lower Bann corridor. To implement the findings of a Lower Bann Corridor Product Identification Study completed in May 2017, a Strategic Development Group was established at the end of 2017 to provide a clear vision going forward for outdoor recreation, tourism and commercial development opportunities along the Lower Bann. Causeway Coast and Glens, Mid and East Antrim, Mid Ulster and Antrim and Newtownabbey Councils together with Tourism NI, SportNI, Honourable Irish Society and Waterways Ireland (Chair) have produced a Strategic Development Action Plan which aims to balance sustainable development opportunities in a cohesive and collaborative way with the Lower Bann corridor being the focus. The development plan integrates with each of the councils regional recreation and tourism development plans and the context and outcomes are focussed on the strategic principles of Programme for Government;
- Appreciate the opportunity to reply via the POP but concerned that the design limits the comments in that it would appear one has to answer 'No' in order to make a comment. Also concerned that such comments are limited to those "with planning related Issues". This is not a planning application document, rather a Development Plan which must consider many aspects such as well-being, contextual, economic and social needs. Glad this is only a step in the process and further opportunity will be provided for discussion;

- Concerned about the lack of discussion of Rathlin Island in the characterisation of local identity to the Causeway Coast. As per our answer to Q 37, the character of the very unique historic environment of the Borough, which is a key driver for the film and tourism industries is not well articulated. Its recognition and understanding will be key to good design and place making. Concerns over para 6.204 of the POP - what are the replacement dwellings opportunities in Rathlin Island? – emphasise that loss of non-designated heritage assets can negatively impact the local identity, distinctive historic character and authentic voice of an area. NOTE: Emphasis in SPPS steers toward reuse of buildings in countryside (SPPS 6.24). See answers to Q9 and Q37 for common related themes;
- It is considered that the Council should consider a joined-up approach with neighbouring Councils with respect to its proposed LDP on minerals.
- Minerals can only be extracted where they are found. In many cases, the economic mineral deposit will be located across several Council areas. In other cases, some Council areas will have a shortage of a particular mineral and a wealth of another. Therefore, the needs of other Council’s mineral requirements are required to be considered; indeed, the mineral requirement of the whole of Northern Ireland is a material consideration for the Council. It has long been proposed by this practice that the most appropriate way to deal with these issues would be to introduce a Regional Aggregate Working Party, like those that have been in place in the English and Welsh regions since the 1970’s, to consider both local and regional mineral source, supply and demand. This is a position that we understand the Council has recognised via its membership of the recently formed Northern Ireland Minerals Forum (NIMF). It is considered that the positions outlined in the POP are contradictory to the Council’s participation in the NIMF and are insular and premature. It is important that minerals are not unduly constrained in advance of having an understanding of requirements both within the Council area and neighbouring areas that rely upon resources within the CC&G Borough. It is considered that appropriate safeguarding is implemented to sustain an appropriate level of supply of this essential resource.
- An accurate socio-economic and environmental profile of the plan area is required in order to inform the preparation of the LDP. It is considered that this is a position that has been recognised by the Council, with surveys being issued and the involvement of the Council at the inception of the evolving Northern Ireland Minerals Forum, as driven by the Department for the Economy.
- Consider that the Council should take a “joined up” approach to working with other Councils to ensure that minerals are not unduly constrained and appropriate safeguarding is implemented to sustain supply to the regionally important Northern Ireland minerals industry. It is considered that the positions outlined in the POP are contradictory to the Council’s participation in the NIMF and are insular and premature.
- Further evidence gathering is recommended in order to fully understand the requirement of planned construction projections and therefore the requirement of the extractive industry for minerals in the Borough;
- There is no option for the handling of high value minerals in the Borough. Consideration of, and consultation on, this matter would be welcomed. High value minerals should be considered separately to low value aggregates. No reference is made to mineral

prospecting licences in the Borough. The Minerals Discussion Paper requires clarification in some parts;

- No consideration has been given to energy demands from the considered growth strategy. See Supporting Information relating to Renewable Energy Targets and Benefits of Renewable Energy submitted by RES which provides a more detailed response;
- Concentration of development within hubs fails to incorporate developing Borough towns;
- The inclusion of the wording 'exceptional' in policy would remove the direct loss of and damage to ancient and long-established woodland, ancient or veteran trees. This would be in line with the NPPF in England and align with the protection of designated areas under the SPPS. A suggested policy is provided, to be supported with clear parameters of what constitutes 'exceptional'. This would provide consistency in planning policy and would compel developers to be more considerate in their approach and result in better designed and located development. Ancient and long-established woodland needs to be protected from non-spatially dependent development. The inclusion of a 50 metre buffer zone around ancient and long-established woodland will ensure sufficient protection for these important habitats, their resilience and their existence in the future. A focus on environmental designations must not obstruct identification of environmental assets that need appropriate management and protection. Ancient and long-established woodlands do not enjoy any protection through designation, but offer unparalleled biodiversity values not found in other locations and important wildlife habitats, a link to our traditional tree heritage and valuable recreational and eco-system services. The Woodland Trust welcomes the recognition of the community woodlands. The protection of the environment must be a robust theme running through the planning process. The Trust has worked closely with farmers through the Heart of the Glens Farm Resilience project to improve farm business using green infrastructure. Support sustainable commercial forestry as a key deliverer of benefits across society. It has been the case that most current commercial forestry plantations have resulted in numerous detrimental impacts to the environment, and should not be classed as sustainable forestry. Background information on the Woodland Trust, its position as a non-statutory consultee, the loss of such woodland to development since 1960s, and information on the size of these areas. Comment is also made on that the management of invasive species must be recognised in planning policy;
- We see that the POP puts forward no options at this stage on coastal development but rather lists what local plans must carry out as per the SPPS requirements. We look forward to seeing the list at paragraph 6.196 of the POP identified in the local plan but we wish to also highlight the following points in the below paragraphs. The local plan policy should protect the undeveloped coast from inappropriate development in accordance with the SPPS. Areas of the coast known to be at risk of flooding, coastal erosion or land instability should be identified. This should be based on the most up to date climate data available to identify those areas at risk for the entire plan period (15 yrs). Shoreline management plans should also be introduced. A presumption against development within the parts of the coastline identified most at risk from existing and potential coastal erosion should be applied. Outside those areas, assessment of development on a case-by-case basis could take place. The above approach would

reflect the National Trust Coastal Management Principles of favouring adaptive responses to coastal change management and working with natural processes. We draw your attention to our vision for our coastline as set out in the National Trust's Shifting Shores work which could be incorporated as the vision for the coast in your local plan strategy. Our vision is: The coastline to be clean and healthy, and shaped by natural forces; The sheer beauty and diversity of our coastline to continue to inspire and refresh people; Wildlife to be rich and abundant, not squeezed into narrow margins; People to access and enjoy every stretch of coastline; A coast that is alive with history, where heritage is understood and valued; Coastal resources put to good use, contributing to the economy of coastal communities in a way that's both sensitive and sustainable; We welcome the recognition of the need for interaction between the marine plan and neighbouring local terrestrial plans. Note that the Council intends to make no changes to the current Rathlin policy. Agree with the approach of identifying Church Bay as a small settlement and the specific policy to further housing opportunities. However, plan should ensure the island's sensitive landscape is sensitively protected;

- Armoy suffers from a lack of off-street parking, the knock on effect of which is disruption to traffic flow resulting in congestion. Clearly a need for additional off-street parking - include policies. Armoy is an evenly split community and is a good example of a fully integrated village. Urge the council to include policies that support development that maximises opportunities to build strong, cohesive communities and that makes a positive contribution to good relations. Note that the NIHE's 'Shared Neighbourhood Programme' aims to develop new social housing on a fully shared community basis. Considering Armoy's even community split, it is well placed to provide social housing in line with NIHE's strategy and the growth of the settlement will benefit both sides of the community;
- The Health and Safety Executive for Northern Ireland (HSENI) is a statutory consultee for Hazardous Substance Consents, developments within the consultation distance (CD) of high pressure gas transmission pipelines and/or within the consultation distance (CD) of major hazard installations regulated under the Control of Major Accident Hazards Regulations (Northern Ireland) 2015 (COMAH). HSENI should also be consulted regarding developments within 100 meters of the boundary of a quarry. HSE's land use planning methodology attached to submission;
- There are many agricultural and industrial sheds in the countryside. Many of these are faced in bright white metal and are visible from a long distance. Request that the Council Planning Department could apply a condition to planning approval that industrial or agricultural sheds should be faced in green to mitigate against the impact on the rural countryside. We would especially emphasise that this should be the case in AONB or countryside which has landscape character;
- If the status quo continues regarding existing SDL's boundaries, there would be little opportunity for members of the local community to remain in this rural area resulting in family members moving to the larger towns or outside the district and beyond. This pattern would in effect erode the local rural community rather than sustain it contrary to the aims of the RDS. Housing opportunities may exist nearby in Kilrea and according to the POP; there is enough capacity within these towns for future growth. Any reliance

however upon existing zonings and settlement limits to meet housing needs without a realistic assessment of dwelling yield is considered unsound;

- Local knowledge of Kilrea has revealed that a large percentage of the housing zonings in Kilrea will never get developed for several reasons. Such housing zonings should be discounted during this plan process and other lands looked upon for inclusion and delivery either in Kilrea or Drumagarner;
- Review of all currently zoned lands in terms of their likelihood of being developed should be carried out as well as an identification of landowner's intentions similar to the approach undertaken by Mid Ulster District Council;
- Council should seek to zone land at a percentage over the target housing provision to support the delivery and choice for a range of sites and prevent land hoarding;
- Council and government at a wider level must ensure adequate infrastructure is in place to service growth and avoid a housing shortage in rural communities;
- Consideration should be given to providing much needed housing within rural settlements to sustain rural communities in line with the aims and objectives of the RDS and sustainable development;
- Road and rail connections should be recognised that connect to Foyle Port, which currently fulfils the role of a gateway for the North West region on both sides of the border as it is the main import/export destination for a range of products entering and leaving the Northern Irish and Republic of Ireland markets. The Council should be seeking to enhance infrastructure linkages to this regional gateway for the benefit of the local economy;
- The Council highlight in para 4.17 on page 26 that two major road schemes are proposed in the Borough. However good road transport links to the Port are essential to sustain and improve import/export trade and Foyle Port welcome these upgrade works that will greatly improve such links and make the Port a more attractive economic growth proposition; in turn create employment which will benefit those living in CCGBC;
- We would encourage the Council to pursue policies in the LDP that will enhance infrastructure links to the nearby regional gateway (i.e. Foyle Port) and assist to facilitate the growth of this regional asset;
- Should be recognised by CCGBC that the continued development of Foyle Port would benefit CCGBC residents as well. Residents could avail of any increase in the level of job creation given the short commute to any of Foyle Port facilities. This potential further reinforces the need to enhance or maintain good infrastructure connections with the neighbouring Council;
- Urge the council to recognise their unique geographical position and progress plans that maximise the strategic infrastructure links to the nearby Regional Gateway of Foyle Port;
- It is noted that 'Table 17: Economic Development Strategy Sectors' of the POP identifies tourism as an 'Important and Growing Sector' and that the POP states that 'Tourism is recognised as a major contributor to the Northern Ireland economy, and its growth should be facilitated'. These aspects are also welcomed, and it is considered that the emerging plan should continue to acknowledge the importance of tourism as a key economic driver for the North Coast Area, particularly for towns like Portrush;

- Additionally, the emerging plan should continue to acknowledge that Portrush ‘...remains the region’s most important tourist resort...’ as set out in the Northern Area Plan 2016 and the plan should also continue to provide support for the further development of Portrush’s tourism potential;
- Request that the emerging plan enables/supports balanced decision making by containing a clear policy direction that all material considerations will be taken into account when balancing the benefits and impacts of a proposal;
- Indeed, noting that deliverability is such a key component of the ‘soundness’ test that is to be applied to all new plans, the plan should also make reference to the importance of commercial viability as a material planning consideration and set out the Council’s approach to considering viability in decision making;
- Land banks should be used as a monitoring tool to provide the Council with early warnings of possible disruption to the provision of an adequate and steady supply of aggregates in the Borough;
- Whilst it is for the Council to prepare its LDP and associated policies, designations such as the ACMD which seek to prejudice future planning applications must be able to uphold robust testing and legal challenge. Therefore, they must be based on sound baselines and an expert level of competency;
- We would propose that our Client’s site is not included within any future ACMD designation. An appropriately worded policy which allows for the development at the site would allow the business to continue to grow, delivering economic and social benefits. The existing designations and other proposed policies within the LDP are considered to be more than adequate in ensuring the development at the site is of a suitable standard. Development will already be restricted by the policies afforded to the AONB, which ensure its protection. The inclusion of the site within any ACMD would unduly restrict the operator and the future growth of the business. By ensuring that emerging policies within the LDP allow for the site’s sustainable growth, it will provide the operator with the necessary confidence to grow sustainably, growing the local economy, creating local employment and helping to achieve the strategic objectives and vision for the LDP. Any future expansion plans would still be subject to intensive scrutiny at the planning application stage. Any further constraint will pose a serious impact not only economically in terms of direct and indirect employment, but also socially, in terms of the capability to continue to provide the raw materials to sustain the local growth envisaged and predicted within the POP;
- As part of the process of collation of information and gaining an understanding of mineral provisions (permitted reserves), annual mineral supply and requirements throughout the plan period will allow the Council to move towards a sustainable solution of providing land banks, thus safeguarding the primary extractive industry and reliant industrial manufacturing sector;
- The importance and purpose of land banks to the local development plan system is specified in the Guidance on the Managed Aggregate Supply System (MASS) 3 and is considered to provide the supply chain basis for all other forms of built development. The guidance provides the reasoning behind the need for, and purpose of, land bank provisions by mineral planning authorities;
 - Provision for Expansion and Redevelopment of Existing Sites

- Co-Locating Technologies
 - Energy Storage
 - De-centralised Power
 - (more info given on each in report)
- RES are concerned that the POP reflects a negative view of wind farm development and fails to recognise the positive role it and other forms a renewable energy has for the wider community in tackling climate change. RES encourage the Council to consider the wider role that renewable energy, in particular wind farm development, can have in balancing the social, economic and environmental needs of the district. RES believes wind energy can play a vital role in fulfilling the plan objectives and the wider objectives of the RDS and UK policies:
 - Social
 - Low cost energy (wind is cheapest form of new electricity generation)
 - Energy Supply
 - Investment in Community Projects
 - Economic
 - Job Creation
 - Investment
 - Economic Value
 - Environmental
 - Tackling Climate Change
 - Transitioning to Low Carbon usage
 - Investment in Natural Resources

Solar energy is the second cheapest form of new energy generation (after wind) and yet the POP makes little reference to this. Energy storage is a proven technology, which provides the opportunity to create a more stable and secure electricity system leading to cost benefits to all consumers. Therefore the LDP policies should be focused on ensuring the delivery of these low cost energy options for the District's population. RES would encourage the Council to have regard to the cost benefits of electricity generation and ensure wind and solar energy and energy storage is adequately planned for as part of the Council's growth strategy.

RES would draw CCGDC attention to the following documents:

- The Paris Climate Agreement 2015 (COP 21)
- UK Climate Change Act 2008
- UK Carbon Plan
- UK Energy Act 2013
- Strategic Energy Framework 2010
- Draft NI Executive Programme for Government
- The Investment Strategy Northern Ireland 2011 – 2021
- The Onshore Renewable Energy Action Plan 2013-2020.

The LDP is intended to provide overarching planning policy guidance to at least 2032; it is therefore wholly insufficient to develop policies for the duration of the plan period based on these outdated targets. RES would encourage the Council to look beyond the 2020 target to develop a robust plan strategy that can sustain the district throughout the plan period. In particular RES would encourage the Council to consider the Paris Agreement and the Draft Programme for Government, which point to a future direction that seeks to promote further growth of renewable energy sector. RES are concerned that under-planning for renewable energy conflicts with the RDS objective to promote positive steps to actively tackle climate change;

RES encourages the Council to create plan policies to promote growth in energy from renewable sources, and a reduction in dependency on imports of oil and gas. This will assist in meeting the shared objectives set out in the wider climate change agenda and those provided by the RDS and the SPPS;

- As policies in the LDP must be evidenced based, recommend that a review of planning applications, and their outcome, in the WHS Distinctive Setting is undertaken, covering the past 10 years. This, along with resident consultation, would better inform policy development;
- The WHS is designated for natural heritage reasons and should therefore be included in sections related to natural heritage. It is understood that the WHS was previously included in PPS6 as guidance was taken from existing British sources, where the majority of WHSs were designated for built heritage and cultural reasons. This error has been perpetuated in the POP. Urge the Council to correct this error and place WHS matters in the appropriate sections;
- The SG advises that CCGBC should ensure that the Department of Digital, Culture, Media and Sport (the UK Governmental Department charged with UNESCO WHS matters) are notified that a new Local Development Plan is being created;
- Objectives appear to be sound. Concern that Plan Strategy is tending towards tighter controls on rural areas to help direct growth towards main towns and villages. More appropriate approach would be to ensure a range and choice of deliverable land is available in main towns and villages to stimulate housing delivery within these more sustainable locations. Undeveloped housing commitments (which may not be delivered) in areas of lower housing demand should not be a basis for the restriction of allocations in more desirable locations;
- Plan is subject to Sustainability Appraisal. Plan Strategy needs to be sufficiently flexible to ensure that after Brexit, it can reflect changes in policy and legislation on environmental matters;
- Legislative and strategic context provided. Policy review of Northern Ireland and English policy frameworks to provide context to enable development within a World Heritage Site and its setting. Overview of UNESCO policy also provided.
- Proper conservation measures in form of positive intervention is required if Dunderave Estate is to continue to positively contribute to heritage value of the locality and by extension to ensure it does not fall into poor state of repair and intervention is required to prevent dilapidation and loss of important historic context.
- List of restoration project outlined. Restoration work will make significant positive contribution to the landscape and heritage setting of the WHS. Other works are

essential for the running of the estate and no impact beyond confines of estate farm cluster. It cannot possibly detract from WHS setting or more critically it's Outstanding Universal Value;

- Concern that the POP does not address the following landscape designations;
 - Areas of High Scenic Value (one is shown around the mouth of the River Bann in the NI Landscape Character Assessment Series 1999);
 - Local Landscape Policy Areas (policy ENV1 Northern Area Plan 2016);
 - Urban and Rural Landscape Wedges.
- The lack of key issues/preferred options about these landscape designations in the POP suggests that strategic policies will not be brought forward. At the point the strategic plan is published, previous Area Plans and the Planning Policy Statements (PPSs) will cease to apply. There will therefore be a policy gap in the protection of the local landscapes of the area until such time as the local plan is published which underpins the necessity of having strategic policies in place to protect the local landscape;
- Coastal Development: The POP quotes the requirements of the SPPS with regard to coastal development (ref: page 97) but no key issues/preferred options have been put forward (ref: page 98). There are a number of issues which are specific to the Causeway Coast & Glens Plan area e.g. the pressure for development along the coastline, coalescence of development/towns, pressure for tourism provision and accommodation etc. within the highly sensitive landscapes of the AONBs and the WHS and its Distinctive Landscape Setting. Concerned that these issues have not been considered in the POP;
- Landscape Character Assessment, sensitivity and capacity studies. There are a number of references throughout the POP about protecting the sensitive landscapes of the Plan area e.g. protection of our most sensitive landscapes (ref: NH1), high structures in sensitive landscapes (ref: PU1), facilitating renewable energy whilst protecting our landscapes (ref: RN1), promoting sustainable mineral development (ref: MN2). At the awareness session in December 2017 presented to planning representatives from all the Councils, NIEA advised that each Council area should undertake an up-to-date local Landscape Character Assessment (LCA) of their area. This will act as an evidence base to inform the LDP re: key issues/preferred options, decisions and judgements about designations and policies, monitoring changes in the landscape character and the reasons for those changes over time etc. It will also be a baseline for “sensitivity” and “capacity” studies which will inform decisions about areas of constraint on various forms of development. Suggest there is an undertaking in the POP to carry out a local LCA, sensitivity and capacity studies;
- The Environmental Objective (b) could be strengthened through the use of the word ‘improve’ .i.e. To protect [and improve] the coastline, river corridors, mountains and other natural and man-made environments in terms of their character, quality and biodiversity;
- General Comments on Climate Change Options; Section 6.209: Following wording should be amended to: “Planning may help to mitigate and adapt to climate change by helping reducing emissions of greenhouse gases that which are contributors to climate change. Planning can also be key in facilitating adaptation to climate change impacts. This Both mitigation and adaptation may be through aspects of planning such as...”
Reason: Reducing greenhouse gases is a mitigation measure not an adaptation measure;

- Section: 6.219 The following wording should be amended to: “Outcomes from the POP Public Consultation will inform the LDP’s Car Parking Strategy. In response to regional planning policy promoting sustainable transport and seeking to address climate change and its potential impacts, the following issues are put forward...” Reason: Includes scope for both mitigation and adaptation;
- Section 6.229: The following wording should be amended to: Climate change can increase the risk of and exacerbate flooding in some areas. Not the primary cause of, nor does it create flooding. The reasons for flooding are many and varied. It will however, exacerbate flooding. Revised PPS 15 ‘Planning and Flood Risk’ sets out planning policies to minimise and manage flood risk to people, property and the environment. The policy direction of PPS 15 is closely reflected in the SPPS. Reason: Suggest this wording as it’s more concise on and reflective of the message which is wished to be portrayed;
- Population Demographics: Estimated population of CC&GB at June 2017 was approximately 143,920 (NISRA), and when compared with the 10 year period from 2007, the population of the Borough grew steadily at 5,545 person representing an increase of 4%. The population of Coleraine as recorded by the 2011 Census was 24,634. As referred to within the POP Sustainability Appraisal at Para 5.1.2, this evident upward population trend is expected to continue with the total projected District population expected to reach 146,898 by 2030 which represents a continued increase over the Plan period, and one that will place a significant and increasing pressure upon the level of existing services and infrastructure, and particularly housing;
- Over-arching concern, consider it a fundamental flaw of the plan to suggest that Coleraine and Limavady should be main hubs, when clearly this should be Coleraine and Ballymoney. Aware this emerges from the RDS, but no patience with this as Limavady is behind Ballymoney in terms of priority and fundamentally as Ballymoney has a similar population and a train station and the main route to Belfast, it carries a greater weight from a sustainable transportation perspective. As a concession, state that the priority should be Coleraine - Ballymoney - Limavady, with it being clearly noted that Ballymoney is a main hub;
- Great concern that the words ‘sustainable’ or ‘sustainability’ has been used throughout the document but not correctly explained or clarified. In its true use, and in the current climate changing world, the word refers to environmental sustainability; it is much more than ‘sustainable’ as ‘survivable’ and this needs greater focus. There is little point in a venture being survivable if it is at the expense of our environment;
- Need policies and discussion on:
 - Mixed-use development as our area has a greater mix of small and micro business and we need to help them work together;
 - Social Enterprise sector and we need to encourage this movement;
 - Ballykelly MJM site, and around other derelict or semi-derelict industrial sites;
 - Second homes, and this needs robust strategy;
 - Cycle routes and greenways as improvements could be made here;
 - Our failing road and rail infrastructure as we need to see improvements to match the increase in dwellers and visitors;
 - Car ownership and the changing nature of parking and movements;

- A third crossing over the River Bann, and discussion should perhaps be placed around it being a tunnel rather than a bridge as an alternative, but based on recent days, this issue needs to become a priority as Coleraine has become a bottle neck on several occasions this summer;
- Retirement homes, retirement facilities, older age living, and ideas for later age housing being different from the requirements of mainstream housing;
- Sports centres, leisure facilities and outdoor enjoyment;
- Our poor record of waste management, waste reduction and waste processing so that we can improve our position, and move towards exemplar rather than bad example;
- Helping existing farms to diversify in their own product of agriculture. This is different from helping farms to diversify to new activity;
- Addition or identification of new hamlets to help build our rural network of locations as support structures in the community;
- The no mention of flags, banners, kerb-painting, bonfires and the ways of addressing these, and it needs to be part of our process. Whilst this is a problematic theme, need to face the challenge and attempt to bring into policy or procedure;
- The issue of design excellence and the fact that excellent design attracts visitors. We need to address the wide range of poor and mediocre design that is simply allowed to occur and is unchallenged. The practice of encouraging anyone to be able to lodge a planning application is damaging the quality of our environment.
- Appears to be no mention of conservation areas, and attention to our listed building heritage and buildings at risk;
- Where are the discussion topics relating to our historic parks, houses, demesnes?
- The task and opportunity of reducing our carbon footprint and aiming for energy independence should be high on topic and has not featured strongly enough;
- Should be pushing towards a zero-carbon or low carbon community, and there is not enough focus given to this issue;
- Where is the discussion around education, schools, college, university and the necessary and vital improvements that need to be made to these structures in our society?
- As an area struggling with infrastructure, need ideas and conversation around Park and Ride facilities and opportunities, not just for our visitor destinations, but also for our day to day locals and businesses;
- Majority of local businesses are reporting a lack of skilled people to employ - need conversation on this topic to ensure we build strategies to help train our young people locally;
- Greater focus should be paid to Coleraine being a University town, and the whole Borough needs to engage with this issue on a wider basis to ensure the University feels welcome, and is prepared to expand in number;
- Need to facilitate our colleges and assist in their strength and position so that our young people can develop, and so that other ages can retrain where necessary;
- Our community groups are vital, but often suffer, trying to fit themselves into planning policies that are designed for other uses and we need specific policies that help community groups to develop and expand their important work;

- Concerned questions are worded in an extremely closed fashion, and this raises issues not least how were the questions contrived, what consultation led to their collection and why is there no additional space for extra questions or comments. Cover letter submitted raising the above additional themes and questions which have not been addressed and will therefore not be responded to, and consider this to be flawed in process;
- Ulster University would encourage that future LDP policies advocate, promote and facilitate the sustainable development strategy as outlined in this document. Ulster University has surplus lands within Coleraine which are unlikely to be required for future expansion (easily accommodated in Areas No. 4 & 6 illustrated at Annex 3).
- The Causeway Coast & Glens Borough Council LDP 2030 will play a key role in guiding and facilitating the expected expansion of UU during the Plan period. This representation sets out the future development strategy the University wishes to employ;
- AONBs are living and lived-in areas, working and worked landscapes that provide economic and recreational opportunities for residents and visitors as well as habitats for important species. Actively support sustainable economic development in AONBs, including through sustainable tourism;
- Welcome proposals that deliver enhanced protection for AONBs and the special landscapes and habitats within their boundaries. AONBs should be considered as unified areas within the Local Development Plan and considers proposed sub-division or internal zonation of these special landscapes, as being likely to result in reduction of the protection and recognition of this designation at a landscape scale. If proposed policies cover whole AONBs, this is likely to increase protection;
- Uncertainty at times whether AONBs are being considered as a 'whole' or whether the intention is to create zones within them;
- Request that Council review key issues and preferred options relating to AONBs collectively and develops a cohesive approach to AONB consideration;
- Invites Council to engage closely with AONB Management Forums in relation to the development of planning policy;
- Encourages Council to engage with other Councils with whom Causeway Coast and Glens shares AONBs, to ensure a consistent approach to planning policy development across these outstanding landscapes;
- No questions relating to second home provision, which given the nature of the Borough is surprising. To be sustainable, bearing in mind that there is also a need for second homes in the area, given it is a key tourism destination for Northern Ireland, and “that second home owners make substantial use of local shops and services and have significant levels of place attachment and local networks of family and friends in the area”, the LDP needs to ensure provision for second homes is accounted for, as it inevitably has a bearing on housing growth, as such owners are mostly from out with the Borough. Portballintrae, which has an estimated 54% second home rate, is affected by such, and would benefit from additional provision of housing for both local and second home provision;
- The current Settlement Development Limit (SDL), is considered to arbitrarily cross Dixons Contactors land ownership. It is considered that the SDL should reflect the

outline of a quarry which has been identified on OS maps for many years. The NAP currently identifies a SLNCI (Designation BNC20) following the line of the quarry. Dixon Contractors consider that the SDL should be reviewed at the location;

- Historic Gardens, Parks and Demesnes: heritage assets require money for their upkeep and imaginative new income streams must be found. Appropriate development, sympathetically located, has the potential to ensure the ongoing viability and survival of historic buildings and environments. Historic gardens, parks and demesnes are often enclosed by extensive mature wooded plantations. These create opportunities for sensitively located development, especially for recreational or tourism use, which have no detrimental impact on the setting of historic buildings, the estate or the wider landscape. Sympathetic forms of development should be facilitated. Woods and Trees: NI has just 8% woodland cover compared to the European average of 46% (Source: Woodland Trust). In addition to enhanced biodiversity, woodland can accommodate a wide range of recreational uses and provide a valuable source of renewable building materials and energy. The LDP should map existing woodland (including ancient woodland and trees subject to Tree Preservation Orders) and identify areas across the borough suitable for extending woodland and for creating new woods.

4.8 OTHER MATTERS NOT RAISED IN THE POP

In addition to responses to the questions posed in the POP, a number of respondents made additional commentary.

These comments have been categorised under the various headings set out below.

General Comments

- The Crown Estate is broadly supportive of the proposals and aims set out. The Crown Estate as a mineral licensor is entrusted to manage its assets and contributes a significant sum to the Treasury, with a potential impact on the working of several parcels of land in the Borough. It awards commercial licences for the exploration and extraction of gold and silver deposits;
- The running order of the POP does not align with the SA and makes it difficult to cross – reference, and is not always concurrent for the key issues;
- The Borough takes in parts of Sperrin, Antrim and North West Forestry Planning Areas (FPAs), which are areas identified for forestry planning purposes by Forest Service. It is intended to review management plans for these during 2018-19, with the issue of scoping consultation documents. New Forestry Plans are being prepared. Forestry Service encourages the creation of new woodlands and management of existing through grants. Information on each forest is provided. The Forest Service works with the Council to provide and promote recreation and tourist potential of its forests;
- The approach to mineral development requires a careful balance to maximise the potential economic benefits while ensuring adequate protection for the environment;
- The National Trust has a significant interest in the natural environment and built heritage in the Borough, owning and managing over 18 sites including Northern Ireland’s top tourist attractions. The trust also contributes to the local economy both directly and indirectly through tourism spinoff. The LDP and the community plan have an important role to play with regard to access to green spaces. Volunteering is an important indicator of the health of local communities;
- Fermanagh and Omagh District Council does not share a common boundary with the Council but is working via the Sperrins Forum to discuss planning issues in the AONB and how each council may address these in its LDP;
- Derry City and Strabane District Council support ongoing co-operation where common issues arise e.g. natural environment, built environment, marine and infrastructure provision;
- The POP has a negative approach to renewable energy and provision of the low carbon economy, and is not in accordance with regional planning policy. A Landscape Character Assessment should be carried out to inform, in part, the approach to renewable energy. A more ambitious approach should be taken;
- The role and importance of minerals to the local economy and to future development is not fully understood. The industry is heavily regulated regarding environmental impacts, quarry restoration is now standard practice and can contribute to biodiversity, geodiversity and natural wildlife targets. Statement needed on current and future

mineral resources in the Borough that will be needed to deliver housing and infrastructure maintenance;

- In general, very impressed by the approach taken and commend the team that has produced it. If the council is able to translate the preferred options into the LDP, we will have the basis of a planning system that would serve the widest public interest in a more coherent, sustainable and accountable way;
- As only one option to SG3, it would appear as if little work has been conducted or research carried out into land availability for housing within our towns and villages;
- Support and encourage continuing collaboration between the Council, Derry City and Strabane District Council and Donegal County Council in line with legislative requirements; and
- Introductory sections clearly explained. As a whole, document is easy to read making it accessible to the public.

Requests for Land to be Zoned for Housing

Lands in the following settlements have been suggested as suitable for zoning for housing development:

Settlement	Area Within
Hubs	
Ballycastle	North West
Limavady	Drummond Manor Edenmore Road East of Edenmore Road
Coleraine	Newmills Road Cromore Roads
Towns	
Bushmills	Straid Road
Dungiven	Ballyquinn/Legavallon Roads
Portrush	Loguestown Road
Villages	
Armoy	Gracehill/Carrowreagh/Hillside Roads
Articlave	South of Mussenden Grange, Dunboe Court & Crescent
Ballybogy	Heagles Road
Balnamore	Balnamore Road
Cloughmills	Ballycreagh Road Drumadoon/Cucrum Roads
Rasharkin	Western area
Drumagarner	Drumagarner Road
Small Settlements	
Artikelly	Dowland Road
Bendooragh	Bann/Drumvale Roads
Glenariff	Glen Road

Knocknacarry	Cregagh View
Largy	Brookfield Park

Requests for Land to be zoned for Economic Development/Tourism/Other Uses

Settlement	Area Within
Hubs	
Coleraine	Gateside Road (Economic Development) Portstewart Road/University Lands (Enterprise Zone, Education, Leisure/Tourism/Recreation, White lands)
Limavady	Edenmore Road (Economic Development)
Towns	
Bushmills	Straid Road (Economic Development/Tourism/Recreation)
Portstewart	Ballyreagh Road (Tourism)
Villages	
Macosquin	Letterload Road

Requests to Amend the Existing Northern Area Plan Settlement Development Limit

Settlement	Area Within
Hubs	
Ballycastle	Hillside Lands to North West
Ballymoney	
Coleraine	Hall Road Wheatsheaf/Quilly Roads Cromore Road/Portstewart Road/University lands Wheatsheaf Road
Limavady	Edenmore Road (2)
Towns	
Bushmills	Straid Road
Garvagh	Killyvally/Kilrea Roads
Kilrea	Edenbane Road Moneygran Road Bridge Street
Portrush	Loguestown Road
Portstewart	Ballyreagh Road Land to East
Villages	
Armoy	Former Armoy Rugby Club (Community/Leisure and Recreation)
Castlerock	Freehall Road

Cloughmills	Drumadoon/Cucrum Roads
Dunloy	Tullaghans Road
Feeny	Feeny Road
Portballintrae	
Small Settlements	
Dernaflaw	Foreglen Road
Drumagarner	Drumagarner Road
Glenkeen	Land to south
Glenullin	Brockagh Road
Knocknacarry	Cregagh Road
Largy	Brookfield Park

Comments on Existing Northern Area Plan Designations

Settlement/Location	Designation
Coleraine	LLPA CEL 16: River Bann and Banks Ulster University Major Area of Existing Open Space
Dunloy	Amend settlement development limit to reflect the outline of a long established quarry.
World Heritage Site Distinctive Setting	Distinctive Setting

Other Areas for Consideration

Additional Designation/Policy Suggestions

- Ballymoney should be identified as a Main Hub;
- The LDP will be required to take account of any revisions to the SPPS. If policy provisions are not consistent with regional policy, this needs to be justified;
- No options for coastal development, where there are a number of issues specific to the Borough;
- Policy to enhance infrastructure links to Foyle Port as a gateway for the North West region;
- Policy required on mixed-use development as the area has a greater mix of small and micro businesses;
- Need policies around the social enterprise sector;
- There is no discussion on historic parks, houses and demesnes. Also, no mention of conservation areas, listed buildings and buildings at risk;
- Policies for the Ballykelly MJM site and other derelict or semi-derelict industrial sites are required;
- Facing of industrial and agricultural sheds with green to mitigate against their visual impact;
- Landscape designations relating to Areas of High Scenic Value, LLPAs, and urban and rural landscape wedges should be included in the POP as, otherwise, there may be a policy gap in their protection;

- A Landscape Character Assessment, sensitivity and capacity studies should be undertaken to inform the plan;
- Amended wording suggested for text on climate change relating to greenhouse gases, car parking strategy and flooding;
- The council should engage close with the AONB Management Forums in relation to developing planning policy. Should work closely with adjoining councils that share AONBs;
- POP should have included questions on second homes;
- Recreational and tourism opportunity of historic gardens parks and demesnes should be encouraged where there is no detrimental impact;
- The plan should identify existing woodland including ancient woodland and trees subject to TPOs and identify areas as suitable for woodland extension and creation;
- Policy wording in relation to ancient and long-established woodland;
- No detailed review of the existing mineral policies in the Planning Strategy for Rural Northern Ireland has not been undertaken;
- No option for the handling of high value minerals in the Borough. No reference to mineral prospecting licences. The Minerals Discussion Paper requires some clarification;
- The SPPS should be reflected accurately in relation to inappropriate retail development in the countryside;
- The plan should be supportive of modern, locally accessible convenience shopping to secure a wide range of community benefits;
- Cam Quarry should be identified as a Safeguarded Mineral Asset with an appropriate buffer zone;

Policy Review Matters

- Health and Safety Executive for NI's statutory role in the planning process;
- Review of existing uncommitted zonings to determine their deliverability. Over provision of housing land to support delivery, provide choice and prevent land hoarding. A range and choice of deliverable land should be available in main towns and villages to stimulate housing delivery in these more sustainable locations;
- Acknowledgement of tourism as a key economic driver for the North Coast Areas, particularly for towns like Portrush and its role as the region's most important tourist resort;
- Areas of Constraint on Minerals Development must be able to uphold robust testing and legal challenge and be based on sound baselines and an expert level of competency;
- Renewable energy policies should not be based on outdated targets. International and national policy direction seeks to promote further growth of this sector and actively tackle climate change;
- Planning applications in the WHS Distinctive Setting should be reviewed. The WHS section should be placed in the Natural Heritage Section. The Department for Digital, Culture, Media and Sport, as the responsible authority, should be noticed that a new LDP is in preparation;

- Plan Strategy needs to be sufficiently flexible to ensure changes in policy and legislation in environmental matters;
- Reducing our carbon footprint and aiming for energy independence is not featured strongly enough;

Other Matters

- No consideration given to energy demands arising from the preferred growth strategy;
- Insufficient options in relation to power lines and constraints and policies, making electrical infrastructure projects very difficult;
- Road infrastructure in the Dungiven area is a major construction project;
- Out of date and incomplete evidence in relation to minerals. Joined up approach with neighbouring councils required regarding minerals. A Regional Aggregate Working Party is required;
- Little reference to young people;
- No reference to village plans;
- No reference to a balanced strategic approach to peat extraction where the resource straddles council boundaries;
- Little reference to river corridors, particularly the River Bann corridor and its Strategic Development Action Plan;
- Questionnaire design limits the scope of responses. A development plan must consider many other aspects, e.g well-being, contextual, economic and social needs;
- Lack of discussion on Rathlin Island and its local identity and unique historic environment which is a key economic driver;
- Dundarave Estate requires positive intervention to continue to contribute to the areas' heritage value. These will have no impact beyond the estate farm cluster and will not detract from the WHS setting or its Outstanding Universal Value;
- The upward population trend evident in the NISRA figures will place a significant and increasing pressure on the level of existing services and infrastructure, particularly housing;
- The words 'sustainable' and 'sustainably' are not correctly explained or clarified;
- The plan will play a key role in guiding and facilitating the expected expansion of the Ulster University;
- Need for off-street parking in Armoy;

4.9 COMMENTS ON THE PLANNING POLICY REVIEW

DfI Response

- Research reports for Development in the Countryside and Renewable Energy development have been received. Officials considering recommendations – to be brought before incoming Minister before publication.
- Department is undertaking preparatory work to inform a future NI Regional Infrastructure Delivery Plan (up to 2040).
- Guidance clarifying the Departments position in relation to policies being translated into LDP Plan Strategy will be issued shortly.
- DfI Roads: notes and agrees with the comments made in Table 21 General Overview of Policy Review. Welcome further discussion re the development of policies for the Draft Plan Strategy.
- TPMU: Planning Policy Statement 3: Access Movement and Parking (PPS 3) – Welcome the commitment to consult with DfI.
- PPS 13 – acknowledge it contains principles (rather than policies). Not all of the general principles have been carried forward in the SPPS. Request Council commit to consulting with DfI as proposed for PPS 3.
- Regional Planning & Policy Team: Note that Appendix 3 addresses the individual strategic policies for the range of types of economic development set out in the SPPS/PPS4. In the majority of cases the POP proposes to retain the policy approach with possible amendments, although it is not clear what the amendments are at this stage.
- Regional Planning & Policy Team: Note that Appendix 3 addresses the individual strategic policies for the range of types of development in the countryside set out in the SPPS and A Planning Strategy for Rural NI. In the majority of cases the POP proposes to retain the policy approach with possible amendments, although it is not clear what the amendments are at this stage.
- Regional Planning & Policy Team: Note that Appendix 3 addresses the individual strategic policies for the range of types of development in the countryside set out in the SPPS/PPS21 (and A Planning Strategy for Rural NI where relevant). In the majority of cases the POP proposes to retain the policy approach with possible amendments, although it is not clear what the amendments are at this stage.
- Regional Planning & Policy Team: Note the contents of the councils policy review.
- Note the POP considers the individual strategic policies in PPS7: Quality Residential Developments (and relevant SPPS policy) as well as the associated addendums in the Planning Policy Review. In relation to PPS7 Policy QD2 it is noted.

Summary of Other Responses

- LDP period should be extended to 2035, to ensure there is a period of at least 10 years between its adoption and its notional end date;
- Second homes (incl impact on and contribution to its host settlement) not properly explored;

- Housing projections should take cognisance of neighbouring councils' plans and allow for a margin of unexpected growth resulting from cross-boundary relationships and provide greater flexibility than relying solely on the HGIs;
- PPS 2, policies NH1 to NH 5 are not addressed. Policies should be provided for Areas of High Scenic Value, Local Landscape Character Areas and Urban and Rural Landscape Wedges;
- The role of Riverside, Coleraine as a major economic driver and in making Coleraine a strong and attractive retail destination with its complementary offer to the town centre, has not been properly considered;
- The well-defined link between mineral provision and economic growth is highlighted, and the council should ensure there are enough resources and materials to deliver the LDP vision and objectives and ensure that mineral resources are sufficiently protected.

4.10 COMMENTS ON THE SUSTAINABILITY APPRAISAL (SCOPING & INTERIM) REPORTS

Sustainability Appraisal (inc. SEA): Scoping Report and Interim Reports

Summary of DfI's Response:

- Policy options to be tested through Sustainability Appraisal (SA) to make the decision-making process as transparent as possible. This is to ensure that a preferred option represents an appropriate alternative when set against the baseline environmental, economic and social characteristics of the district, and assessed in combination with all policy proposals. Council to provide evidence of this assessment. Failure to undertake SA of these elements may raise issues of procedural soundness and or coherence/consistency.
- Consider the broad thrust/direction of current operational planning policy/supplementary guidance in relation to all key issues to be generally acceptable with no evidence to suggest that policy needs to be substantially amended. Any proposals to carry forward existing operational policies should also be the subject of SA (inc. SEA). Failure to undertake Sustainability Appraisal of these elements may raise issues of soundness.

Summary of Other Responses:

Scoping Report

- Important to keep the historic environment evidence base up to date throughout LDP process. Must demonstrate how the evidence base has been utilised in informing scoring, or appropriate mitigation such as designation or key site requirements. Would welcome the inclusion of HED in the List of Abbreviations.

3.3 Spatial Scope and Profile of the Plan Area: HED are concerned at the lack of reference to the historic environment in this section. Reference for example, to the many coastal castles of the region would have been appropriate. The dramatic coastline of this area has influenced the siting of some dramatic heritage sites, creating an historic landscape not typical of anywhere else on the island of Ireland. As a general observation we note that the overlap of the historic environment with many of the topics, including Natural Resources, is not recognised or articulated. Recognition of this intertwined nature of landscape, historic and natural environment will be crucial to enable robust assessment.

5.14.2. HED consider that the overview could have been broadened slightly to demonstrate the unique historic character of the area, giving examples of a few more specific assets. See the subsection 'Interim Report' for comments around 'Record Only' interpretation. In relation to ASAI, page 114, HED advise that we have identified an ASAI at Banagher and will forward further information on this to the council in due course.

Areas of Archaeological Potential – We note the last line on page 114. We advise that AAP's are part of the National Monuments and Buildings Record and are identified rather than designated through Local Development Plans.

APPENDIX 3 Compatibility of the Sustainability Objectives HED advise that it would be more accurate to score the relationship between objective 14 with objective 8 as uncertain rather than no relationship. Page 180 we advise that the interpretation provided in the report with regard to the European Convention on Archaeological Heritage is inaccurate. -This superseded the London Convention not Granada. We advise that the implications of the convention for the plan should consider Article 5 which seeks integrated conservation of the Archaeological Heritage through its consideration in the preparation of LDPs and the creation of planning policies designed to ensure well-balanced strategies for the protection, conservation and enhancement of sites of archaeological interest. Page 181 - we advise that the implication of the Granada convention are around architectural heritage and that Article 10 should be considered. Page 182. We highlight that a specific implication of the Historic Monuments and Archaeological Objects Order will relate to scheduled historic monuments. These require a specific type of permission – scheduled monument consent, which is legislatively separate from planning permission. Therefore the areas of scheduled monuments (scheduled zones) have specific implications as regards zoning. HED would advise that it is important that Key issues highlight actual issues around the historic environment as opposed to statistical facts. Moving forward to Plan Strategy stage indicators which demonstrate effective monitoring strategies to monitor the effects of the plan will be an important component of a robust SA/SEA. In relation to monitoring effects HED stress the importance of having meaningful indicators in order to measure these. Examples of useful methods of monitoring effects of a plan or programme on the historic environment might include: The number of Scheduled Monument Consents related to planning applications, The number of planning conditions that have had archaeological conditions attached, The number of Conservation Areas and/or Areas of Townscape Character designated or removed, The number of non-designated heritage (in CA, ATC or the countryside) assets re-used/enhanced, demolished or replaced, and the number of planning decisions which overturn consultations advice/recommendations throughout the Plan period;

- SA/SEA lacks sufficient detail in order for a robust assessment of the proposed plan policies and all reasonable alternatives to be accurately assessed

The information employed by the Council has been provided by the DfE and QPANI. It is recognised that with the cessation of collection of this information for a number of years, the usefulness of the current snapshot is of limited value. It is unclear as to whether any primary data has been collated or published by the Council, such as, we would question whether the Council accurately knows the quantum of permitted reserves within the Council area and the annual demand for the same. It is considered that this is a position that has been recognised by the Council, with surveys being issued and the involvement of the Council at the inception of the evolving Northern Ireland Minerals Forum, as driven by the Department for the Economy. Therefore, without an accurate socio-economic and environmental profile of the plan area, this will result in an erroneous scoping report, conclusions and assessment of the POP.

No consideration appears to have been given to a 'joint approach' with neighbouring Councils. The strategic approach is solely based upon adopting buffer zones around existing sites and designating ACMD'S and areas where mineral development will be acceptable in principle. The alternatives studied by the Council are not considered to be 'broad strategic alternatives'.

It is considered that the SA/SEA, in its current form, lacks quantifiable or qualitative evidence. For example, there is no provision within the assessment as to how many jobs the various options would either sustain or create, no detail of the level of mineral which could potentially be sterilised as a result of the options and no detail on what level of new reserves would be required in order to sustain the wider industry.

We believe the SA/SEA is required to be revisited in order to accurately assess the options presented within the LDP and to sufficiently assess all the reasonable alternatives. Future assessment should be based on up to date, primary evidence. The strategy which has been taken does not appear to reflect the evidence- driven approach described above and which is also envisaged in the SPPS.

By not taking such an approach, this will result in an erroneous scoping report, conclusions and assessment of the POP.

It is vital that the extent of any future designation is identified through a well evidenced, data collection exercise that takes account of the existing enterprises and extraction workings at Murnee's.

Landbanks should be used as a monitoring tool to provide the Council with early warnings of possible disruption to the provision of an adequate and steady supply of aggregates in the Borough

The Sustainability Appraisal/ Strategic Environmental Assessment (SA/SEA) lacks sufficient detail in order for a robust assessment of the proposed plan policies and all reasonable alternatives to be accurately assessed;

- Welcome the commitment to undertake a SA and HRA, and that draft HRA will be published with the Draft Plan Strategy, and that a HRA Screening is within the SA Scoping report. Now is the ideal time to establish what the key sensitivities of the various protected sites are to ensure their needs are reflected in the design of the Plan, and to employ effective avoidance techniques, as opposed to mitigation measures as

per tier 1 of the mitigation hierarchy. Full protection should be ensured to both designated and non-designated sites important for wildlife and biodiversity;

- It is noted that the SA Scoping Report will be updated throughout the Plan preparation process;
- Transport and Accessibility: On page 70, 5.8.1, with reference to the wording: "some measures to achieve this are directly linked to transport and include reducing emissions from transport, improving energy efficiency and protecting Air Quality Management Areas {AQMA's}", the priority should be to improve air quality and meet air quality objectives in order to revoke AQMA's not 'protect' them.

On page 77, 5.9.2, with reference to the wording: "There is an important link between air quality and human health. Recent Departmental figures for Northern Ireland indicate that 553 deaths can be attributed to particulate matter (PM10), and 330 to NO2". Can the council provide a reference for these figures?

With reference to Appendix 4, 'Review of Projects, Plans, Projects and Strategies', it is noted that there is no reference to existing or evolving neighbouring Plans in the Derry & Strabane, Mid Ulster or Mid & East Antrim Council areas. There are a number of cross boundary designations (AONBs, SPAs & SACs) along with a 'shared' coastline whose protection, conservation and use would benefit from cross council discussion.

With reference to 'Little Terns', *Sterna albifrons*, page 103, it should be noted that they are thought to have last bred at Magilligan in 1984

<http://www.habitas.org.uk/priority/species.asp?item=370> . Other bird species associated with the coastal habitats in the Council area would be the wintering wildfowl and waders of Lough Foyle, the breeding Cormorants, *Phalacrocorax carbo*, of Sheep Island and the seabirds of Rathlin Island.

With reference to Section 6, The SA Framework, item 12, 'International obligations' in respect of biodiversity are referred to. It is unclear as to whether the objective also refers to 'national objectives'. For example, both international and national policies are referred to under item 13 'landscape character'.

With reference to Appendix 7, it is noted that the HRA includes a 15km zone of influence which takes in trans-council boundary and trans-border (national) designated European sites;

- Following our review Dalradian have significant concerns with regards to the process and content of the SA/ SEA Scoping report which are;
 - The publication of an SA Scoping report template for consultation as opposed to a full SA Scoping report.
 - Publication of a full SA scoping report alongside the POP and supporting SA documents which removes the ability for stakeholders to comment on the content of the scoping report prior to the publication and assessment of the POP paper and therefore positively influence the evolution of the local plan. The content of the scoping report and specifically the baseline information which does not portray an accurate socio-economic and environmental profile of the plan area which, in turn, unduly influences the scoping report conclusions and assessment of the POP. The publication of an SA Scoping report 'template' for consultation as opposed to a full SA Scoping report.
- 5.12 Paragraph 6.2 and Figure 1 of the SA/ SEA guidance document sets out the key stages of the LDP process and how the SA/ SEA process should interact with it.

Paragraph 6.2 states that “Whilst there are clear linkages at various stages of both processes, it is important to note that the preparation of the LDP and SA should be an iterative process whereby findings at each stage should be taken into account to inform subsequent stages of the plan. 5.13 Figure 1 of the guidance clearly links the SA Scoping report with the production of POP but states that Stage A(1) SA Scoping Report should be prepared, issued for consultation and (subject to consultee comments) amended before the assessment of alternatives within the POP. 5.14 Section 2.7 of the CCCG the scoping report suggests that a ‘scoping report template’ was issued for consultation in June 2017. Appendix 6 of the scoping report suggests that consultees were given the opportunity to comment on the ‘scoping report template’ as opposed to a formal SA scoping report and content. 5.15 Dalradian have concerns over this approach as this would not have allowed the statutory consultees and other interested stakeholders to formally comment on the baseline evidence and SA framework. Paragraph 7.1 of the DPP note states that: Although a formal scoping report is not mandatory, it is considered a useful way to set out the evidence base and framework of sustainability objectives against which the social, economic and environmental effects of implementing the draft plan can be appraised. 5.16 CCGC have issued the SA Scoping report for consultation at the same time as the POP and its supporting interim SA. 5.17 Dalradian consider that the need to receive and assess statutory and non-statutory consultee comments on the SA Scoping report prior to the assessment of alternatives within the POP is a fundamental requirement of the guidance and process for the following three reasons;

(i) One of the first and most important requirements of the scoping report is to establish the environmental and socio-economic baseline of the area in question. This is a requirement of the guidance and EAPP regulations. The SA/ SEA guidance document states that; The baseline information should enable a council to determine the current state of the social, economic and physical environment.

The baseline data is then used to identify any key sustainability issues and help inform the SA Framework which is used to appraise and influence the development of the reasonable alternatives. If there are gaps or errors in the baseline information then this will impact the outcomes of the plan and its preferred policies.

(ii) The need to ensure the correct sustainability issues are identified which the plans policies should then attempt to mitigate or enhance.

(iii) The structure of the SA framework will significantly influence the policies and the plan making process and therefore comments on the SA framework should be received and incorporated prior to assessment of the reasonable alternatives.

5.18 It is also considered best practice to allow wider stakeholders such as members of the public within the plan area the opportunity to comment on the SA Scoping report.

5.19 Paragraph 3.5 of the 2005 SEA Guidance states the following;

The Directive refers only to consultation with the Consultation Bodies and with the public. Responsible Authorities will however normally consult a range of other bodies in the course of preparing their plans and programmes (e.g. Local Authorities, Regional Development Agencies and Primary Care Trusts) and information from these may be useful in SEA. 5.20 As part of responsible plan making Dalradian firmly believe that the SA Scoping report should have been submitted for consultation prior to the

development and publication of the POP and its supporting SA report and this failure fundamentally undermines the process. 5.21 As stated above, the content of the SA Scoping report has a fundamental impact upon the POP, its SA and the ongoing local plan process. 5.22 Dalradian set out their concerns below with regards to the information within the scoping report along with references to supporting evidence where necessary. 5.23 Dalradian would like to make the following comments with regards to presentation of baseline data and key sustainability issues which are presented within Section 5 of the SA Scoping report. 5.24 Section 5.7 of the SA scoping report presents the baseline information and key sustainability with respect to the SA topic – Physical Resources, which includes minerals. The SA also refers to the background topic paper prepared by CCG which is intended to provide detailed baseline evidence. With respect to this information Dalradian identify a number of concerns: There is little or no mention or attempt to quantify the scale of the potential gold resource within the CCG plan area. Dalradian believe that there could be substantial gold resources which are capable of making substantial economic and social benefit to local residents and workers. Lignite is identified as a separate mineral resource of key importance yet gold (a highly valuable precious metal) is not differentiated. The ‘key sustainability issues’ fails to recognise the economic potential from the gold resource. Dalradian would suggest that the following is added to this specific section: The scale and distribution of gold reserves should be quantified to enable the development of policies to ensure its sustainable extraction and resulting social and economic benefits. 5.25 In summary Dalradian believe that the baseline section of the SA Scoping report and its supporting evidence base fails to recognise (or attempt to recognise) the scale and significance of the potential gold reserves within CCG. Such an omission creates a significant risk that the CCG POP will fail to develop policies that secure the substantial social and economic benefits from this valuable resource.

Summary of Other Responses:

Interim Report

- Appropriate and effective mitigation measures must be put in place, particularly for objectives 10 & 11 in relation to the Spatial Growth Strategy, e.g integrating tree planting to all housing developments to improve water management, increase flood alleviation, create a carbon store and increase landscape resilience which will all contribute to climate change reduction and mitigation;
- HED recommend revisions of the SA Interim Report in light of our comments. Concerns that there are some inconsistencies and inaccuracies in relation to scoring in relation to the historic environment objective and advise that the scoring and justification through the assessment must be revised to be more robust (attach guidance document in relation to SA and the Historic Environment to advise toward this and provide commentary below - link provided). Concerned that the intertwined relationship of the historic environment to landscape character and the natural environment is not recognised across much of the scoring (as intertwined assets these resources have similar benefits and vulnerabilities). Where any new development is concerned, -

economic, renewable, infrastructure, or housing, while in some cases there may be a positive effect for the historic environment, there is always significant potential for negative effects, i.e. through impacts on setting, or unidentified assets, or on previously unidentified below ground archaeological remains. Archaeological work is not considered anywhere as a potential mitigation for negative impacts on remains, in fact case the discovery and recording of remains, is in some cases recorded as a positive. While identifying remains is in itself positive, it must be borne in mind that remains are destroyed, (and therefore negatively impacted), albeit recorded through the systematic process of archaeological excavation. It would be appropriate to recognise this negative in scoring and outline how archaeological mitigation can offset the effect in those instances. These issues need to be factored in at Plan Strategy stage to ensure more robust appraisal in relation to the historic environment. In relation to the discussion of plans policies and programmes in the scoping report we highlight that, as well as scheduling monuments, the Historic Monuments and Archaeological Objects (NI) Order 1995 makes provision for Scheduled Monument Consent which is required for works to these. It also makes provision for the acquisition of monuments into State Care. For clarity when reviewing our (HED) databases: 'Not Allocated' records occur to make available information about the record that is not appropriate to any other field within in the database record. Examples include: - a record that was previously recorded in the wrong ward and is now recorded in the correct ward under a new reference number, or where a record is split, such as a terrace, and renumbering is required. Within the database a general comment is added to explain the reason for the action and it also points to the new record reference. 'Record Only' – The heritage value of the building/structure was considered and the Department concluded following evaluation that though of some interest it is not of sufficient interest required for statutory protection as a listed building/structure.

Note, the 'Record Only' buildings may be a good reference for council if and/or when the council consider Local Listing therefore, these may be useful in terms of an initial identification tool. Link provided to useful guidance document prepared by HED.

Generally throughout the SA we recommend clearer articulation of potential mitigation measures in relation to the historic environment to illustrate how impacts are offset (where and if they can be). Greater recognition needs to be borne throughout the SA as to the potential negative effects of development on previously unidentified below ground archaeological remains and the means of mitigating this. Specific concerns raised in relation to Key Issues: SG2 - Settlement hierarchy; SG 3 - Zoned development land; HS 1 - Social housing distribution; OS 1 - Provision of open space; OS 3- Provision of green and blue infrastructure; ED1 - Economic development land; RT2 - Town, village and local centre boundaries; TO1 - Tourism opportunity zones; MN2 - Sustainable minerals development; MN4 - Lignite resource; CY1 - Dwellings on farms; CY 2 - Economic development in the countryside; WH 1- Development within the World Heritage Site's Distinctive Setting; TP 2- Parking provision at key tourism assets; FR3 - Use of SuDS; RN 1- Renewable energy; DC1 - Developer contributions; and PU1 - High structures in sensitive landscapes;

- The SA/SEA lacks sufficient detail in order for a robust assessment of the proposed plan policies and all reasonable alternatives to be accurately assessed

The information employed by the Council has been provided by the DfE and QPANI. It is recognised that with the cessation of collection of this information for a number of years, the usefulness of the current snapshot is of limited value. It is unclear as to whether any primary data has been collated or published by the Council, such as, we would question whether the Council accurately knows the quantum of permitted reserves within the Council area and the annual demand for the same. It is considered that this is a position that has been recognised by the Council, with surveys being issued and the involvement of the Council at the inception of the evolving Northern Ireland Minerals Forum, as driven by the Department for the Economy. Therefore, without an accurate socio-economic and environmental profile of the plan area, this will result in an erroneous scoping report, conclusions and assessment of the POP.

No consideration appears to have been given to a 'joint approach' with neighbouring Councils. The strategic approach is solely based upon adopting buffer zones around existing sites and designating ACMD'S and areas where mineral development will be acceptable in principle. The alternatives studied by the Council are not considered to be 'broad strategic alternatives'.

It is considered that the SA/SEA, in its current form, lacks quantifiable or qualitative evidence. For example, there is no provision within the assessment as to how many jobs the various options would either sustain or create, no detail of the level of mineral which could potentially be sterilised as a result of the options and no detail on what level of new reserves would be required in order to sustain the wider industry.

We believe the SA/SEA is required to be revisited in order to accurately assess the options presented within the LDP and to sufficiently assess all the reasonable alternatives. Future assessment should be based on up to date, primary evidence. The strategy which has been taken does not appear to reflect the evidence-driven approach described above and which is also envisaged in the SPPS. By not taking such an approach, this will result in an erroneous scoping report, conclusions and assessment of the POP. It is vital that the extent of any future designation is identified through a well evidenced, data collection exercise that takes account of the existing enterprises and extraction workings at Murnee's.

Landbanks should be used as a monitoring tool to provide the Council with early warnings of possible disruption to the provision of an adequate and steady supply of aggregates in the Borough;

- RES would encourage the Council to consider the future energy demands for the district. Without this baseline information it is not clear whether the balance has been struck between meeting the social energy supply needs of the region, the economic and environmental costs of importing energy and gas. The absence of this baseline information has implications for the SEA of the plan policies;
- The Environmental Report should include a section on how 'Monitoring' shall be carried out. A description of the measures envisaged concerning monitoring in accordance with regulation 16 should be included in the final Environmental Report;
- 5.27 Page 40 of the SA presents the policy options (reasonable alternatives) and SA of the Minerals policies. MN1: Promoting Sustainable Minerals Development – buffer zones. 5.31 It is important for the Council to consider the following extracts of the Planning Practice Guidance²⁴ with respect to SEA and specifically the selection and

rejection of reasonable alternatives:

The sustainability appraisal needs to compare all reasonable alternatives including the preferred approach and assess these against the baseline environmental, economic and social characteristics of the area and the likely situation if the Local Plan were not to be adopted.

The sustainability appraisal should predict and evaluate the effects of the preferred approach and reasonable alternatives and should clearly identify the significant positive and negative effects of each alternative.

The sustainability appraisal should identify, describe and evaluate the likely significant effects on environmental, economic and social factors using the evidence base.

The sustainability appraisal must consider all reasonable alternatives and assess them in the same level of detail as the option the plan-maker proposes to take forward in the Local Plan (the preferred approach).

Reasonable alternatives are the different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

The sustainability appraisal should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives, including those selected as the preferred approach in the Local Plan. Any assumptions used in assessing the significance of effects of the Local Plan should be documented.

5.32 Dalradian have significant concerns with regards to the assessment of Policy MN1 and its conclusions which are summarised below:

(i) Option 1 refers exclusively to the identification of buffer zones around quarries and makes no reference to the development of minerals despite this being the overarching objective of Policy MN1. Options 2 and 3 refer to minerals development although Option 2 makes no reference to quarries.

Option 1 will therefore not achieve the desired policy objective as it does not address minerals development only quarries. Given that there are substantial mineral deposits within the plan area that could be extracted under Option 2 and 3 (subject to the details of the buffer zone), Option 1 cannot be considered a reasonable alternative for promoting sustainable minerals development.

(ii) Page 41 of the SA presents the sustainability assessment of these three options which concludes that Option 1 is the most sustainable on the basis that it secures three positive scores against SA objectives 1, 5 and 7:

- 1)....improve health and wellbeing
- 5)...enable sustainable economic growth
- 7)...protect physical resources and use sustainably.

With regards to positive impacts against objectives 5 and 7 Dalradian believe these should be recorded as negative impacts on the basis that Option 1 does not consider minerals development other than quarries. Excluding minerals development from this policy removes the potential for substantial economic and social benefits from sustainable minerals extraction.

On this basis, Option 3 would be the most sustainable option as it would facilitate all minerals development subject to a suitable buffer zone to residential settlements.

(iii) SEA guidance clearly requires all reasonable alternatives to be assessed to the same level of detail in order to understand their sustainability impacts however the policy options as presented do not allow such an assessment as they refer to unquantified distances and resources. For example, it is recognised in the SPSS that sustainable minerals extraction can only occur where the minerals are located and therefore a policy that restricts minerals extraction that is within a pre-determined distance from a residential settlement will have a very different sustainability performance to the same policy applied to minerals located a significant distance from residential settlements. Dalradian therefore believe that the correct and sound basis for the evolution of this policy was to select the most sustainable option (Option 3) and then present further reasonable alternatives for the distances for the buffer zones and to neighbouring settlements.

MN2: Promoting Sustainable Minerals Development – Areas of constraint on Minerals Development (ACMD). Concerns with regards to the lack evidence supporting the evolution of these reasonable alternatives which includes a lack of clarity with regards to elements of these options which include:

(i) The absence of a map demonstrating minerals resources against environmental and landscape quality. If such a map effectively excludes all minerals development then it cannot be considered a reasonable alternative.

(ii) Without the identification of areas to be protected under Option 3, the sustainability performance of this reasonable alternative cannot be identified. For example, if the protected areas constitute the all or the majority of precious minerals then such a policy option cannot be considered sustainable nor in accordance with the SPSS.

5.35 Notwithstanding Dalradian's concerns with regards to the evidence to identify the policy options and the soundness of these, Dalradian note that the SA concludes that Option 3 is the most sustainable despite Option 2 recording the most positive sustainability impacts. 5.36 The SA states however that Option 3 is preferred on the basis that ...it provides a spatial element with a major positive impact upon SA objective 14...protecting the landscape. 5.37 Dalradian reiterate earlier concerns with regards to the assessment of the reasonable alternatives on the basis that the sustainability impacts of Option 2 and 3 cannot be identified in the absence of further detail with respect to the location of the protected areas. 5.38 Dalradian also have significant concerns with regards to the scoring of the policy options which are set out below:

(i) Dalradian disagree with the conclusion that minerals development will not have a positive effect on the social sustainability issues. The substantial economic benefits secured through precious mineral extraction and the creation of high paid jobs will unquestionably provide social benefits as stated in the SPSS.

(ii) Dalradian also firmly believe that minerals extraction can lead to a major positive to the local economy and not a minor benefit as recorded in the SA. The proposed gold extraction with the Fermanagh and Omagh District Council will generate billions of pounds and therefore result in major economic benefits.

(iii) It is noted that Option 3 (the preferred option) is identified as having an uncertain impact upon the local economy as the extraction of precious minerals may be restricted

by the designated areas. As stated earlier, it is critical that the designated areas are clearly identified through consultation with the relevant stakeholders before the sustainability impacts of this policy are identified. Furthermore, Dalradian believe that, given the conclusion that Option 3 will restrict minerals development it cannot be considered a reasonable alternative. 5.39 Based upon the representations outlined in this document and following a review of the SA documents accompanying the POP, Dalradian have a number of significant concerns with regards to the selection and rejection of reasonable alternatives to deliver sustainable minerals extraction. These are:

- The absence of an appropriate evidence base to demonstrate that the reasonable alternatives are deliverable and will meet the policy objectives.
- Inaccurate scoring of the sustainability performance of the reasonable alternatives as a result of missing or inaccurate evidence which results in the selection of a policy option that fails to meet the requirements of the SPSS or POP for sustainable minerals extraction.

5.40 Fundamentally, Dalradian believe that there are sufficient gold resources within the CCG plan area that can be identified and extracted sustainably which could result in major economic and social benefits whilst ensuring the protection and restoration of the environment.

4.11 COMMENTS ON THE EQUALITY SCREENING: INTERIM PROGRESS REPORT

Equality Screening

The Council received no responses relating to the published Interim Progress Report.

5.0 CONSIDERATION

Initial Public Consultation Outcomes

5.1 The POP process has been beneficial in that it has highlighted the following:

- areas of work that require further consideration;
- matters that would benefit from further clarification;
- issues that are particular to the local community;
- additional sources of information that are beneficial to the plan process; and
- administrative issues that should improve the subsequent stages in the plan's production.

Summary

5.2 As stated at the beginning of the report, this initial report presents a summary of the responses received and is for information purposes only. It does not, at this stage, analyse the content of those responses or suggest policy approaches going forward.

5.3 The future LDP work programme will focus on an analysis of the detailed issues raised in response to the POP, including liaison with statutory consultees, and respondents (where relevant). New data sources, including relevant NISRA research and the Council's proposed Landscape Character Assessment, will also help inform the preparation of the draft Plan Strategy.

5.4 Following completion of this work, a further Public Consultation Report will be prepared to comply with the Council's Statement of Community Involvement, and with the Planning (Local Development Plan) Regulations (NI) 2015, Regulation 11(4) which states that, with regard to consultation on the POP:

"A council must take account of any representations made in accordance with paragraph (2) before it prepares a development plan document."

6.0 APPENDICES

Appendix 1: POP Public Consultation

Engagement Events: Summary of Issues Raised

Event	Date & Time	Location	No. of attendees	Issues raised
Benbradagh DEA	23/07/18 10.00am – 12.00pm	Dungiven Library, Main Street, Dungiven	10	Accessibility for all Economic development Zoning of housing land Dungiven By-pass Future role of Dungiven
Bann DEA	24/07/18 2.00pm – 4.00pm	GADDA, Main Street, Garvagh	0	None
The Glens DEA	25/07/18 2.00pm – 4.00pm	Sheskburn House, Ballycastle	3	Eldercare Accessibility for all Natural environment & habitats
Limavady DEA	26/07/18 10.00am – 12.00pm	Roe Valley Arts & Cultural Centre, Limavady	6	Zoning of housing land
Rathlin Island	27/07/18 12.30pm – 2.30pm	Branson Centre, Rathlin Island	6	Challenges faced by islanders Social Housing Island facilities, e.g sports hall Private Housing Environment Employee accommodation
Coleraine DEA	30/07/18 5.00pm – 7.00pm	Coleraine Leisure Centre	8	Eldercare/ Age Well Retirement Villages Youth Facilities (Portrush)

				Public use of Council assets Social Housing (P'Stewart) Second Homes (C'Rock)
Ballymoney DEA	31/07/18 10.00am – 12.00pm	Ballymoney Town Hall	5	Ancient & Long-established Woodlands Climate Change & Adaptation Biodiversity Public Utilities (electricity)
Causeway DEA	01/08/18 2.00pm – 4.00pm	Portrush Town Hall	12	Environment Renewables Second homes Harbours
Chambers of Commerce	12/09/18 6.00pm - 7.00pm	Ballymoney Town Hall	3	Tourism
Youth Forum	17/09/18 10.30am - 12.00pm	Roe Valley Arts & Cultural Centre, Limavady	15	Impact of tourism Promotion of tourism sites Renewable energy Climate change Telecommunications Housing density Rathlin island Better access to facilities and services (town centres) Lack of evening economy & entertainment in towns Distribution of employment opportunities Minerals Family connections Rural dwellings/peaceful settings Town & village expansions
Community Groups (private meetings)	19/09/18 10:00am - 6.00pm	Auditorium, Ballymoney Town Hall	1	Armoy – cross community working

				Waste Water Treatment Works (WWTW): capacity issues
Community Groups (public meeting)	19/09/18 7.00pm – 8.00pm	Auditorium, Ballymoney Town Hall	1	Cloughmills Built Heritage protection Zoning for community facilities
Older Adults & Aging Population	21/11/18 2.00pm – 4.00pm	Club Room, Coleraine Leisure Centre	5	Social isolation and impact on mental health Housing to meet aging population needs, including bungalows, retirement villages Integration of young and old in society Recognition of competing demands on infrastructure and diminishing public sector purse and ability to meet these in the context of sustainable development

Appendix 2: List of Respondents

Overseeing Authority
Department for Infrastructure (DfI)
Department of Agriculture, Environment & Rural Affairs (DAERA) SEA Team

Statutory Consultees
Department for Communities (DfC) HED
DAERA
DAERA – NIEA
Derry City and Strabane District Council
Department for Infrastructure (DfI)
Department for the Economy (DfE)
Fermanagh and Omagh District Council (FODC)
Mid and East Antrim Borough Council (MEABC)
Mid Ulster District Council (MUDC)
Scottish Power Renewables
SONI Ltd

Other Correspondents
Adams Family Representation
ABO Wind NI Ltd
Adams, Mr & Ms
Alastair McHenry Construction Ltd
Andras House Ltd
Ardvarness Quarry Consortia
Armoy Community Association
Ballerin GAA Club
Belfast Civic Trust

Bell Architects Ltd
Canavan Associates Ltd
Casement, Mr
Castlerock Community Association
Causeway Coast Communities Consortium
CCG Heritage Trust
Clarke Quarries Ltd
Coleraine Youth Council - Education Authority Youth Service
Conway Estates
Creith, Mr
Crown Estates
Currie, Ms
Dalradian Gold Ltd
Dalzell, Mr
Dalzell, Mr
Dixons Contractors
Donaghy, Mr
Donaldson Planning Ltd
Dundarave Properties Ltd
Estate of Family of Rising Sun Farm Greysteel
Farmers For Action
Foyle Port
FP McCann Ltd
Glenshane Community Development
Hall Submission
Halliday Holdings
Health and Safety Executive NI
Henderson Group Property
Henry, Mr

Herron Bros
Hutchinson,Mr
Joel Ltd
Kelvin Properties Ltd
Letor Ltd
Lidl Ltd NI
Loskan Properties Ltd
Lynch, Mr
Lynn, Mr
Mae Murray Foundation
Marks, Mssrs
Mathewson, Mr
Mc Fall Construction
McCloskey, Mr
McCloskey, Mr
McGrandle, Mr
Milltown Service Station Ballymoney
Moore, Mr
Mullan, Mssrs
National Trust
Northstone (NI) Ltd
Portstewart Inter Church Civic Project (Portstewart Together)
Portstewart Vision
QJQ Architecture
QPANI
Quinn Family Representation
Radox Laboratories Ltd
Renewable Energy Systems Limited
Retail NI

RSPB NI
Seaport NI Ltd
Studiorogers
Tawneymore Ltd
TC Town Planning
Tesco Coleraine
Translink
University of Ulster
Waters, Mr
Waterways Ireland
Wilkinson, Mr and Mrs
Wilson Representation
Wilson, Mr
Woodland Trust

