

DPS-S-003

Local Development Plan | 2030

Draft Plan Strategy

Representations by Respondent
Report

March 2021

This document is one of a series of reports prepared to accompany the Council's Draft Plan Strategy Public Consultation Report. All documentation should be read together.

This report sets out in a tabular format further detail on the main issues raised by each respondent at the DPS stage by order of each individual representation. This a summary of the main issues by each respondent, the relevant reference number, name of respondent and the Council's position.

The Council has reviewed all 122 submissions received during the consultation, with the table overleaf setting out in a tabular format further detail on the issues raised by all respondents at the DPS stage, the relevant respondent details and the response of the Council to each issue raised.

Reference	Respondent	Plan Policy	Summary of Representation Issue	Modification Sought	Council Response
LA03/DPS/0001	Andrew Crothers	SP 3	Mr. Crothers considers the DPS to be sound but requests that the Transport Plan includes the dualling of Templepatrick Road, Ballyrobin Road, a by-pass for Templepatrick and a railway halt at BIA.	No specified modification.	No change required. The Council considers the policy as drafted is reasonable and appropriate, and has taken account of the provisions of the RDS and SPSPS. The rationale for the policy is provided in the text "Why we have taken this approach". The Council considers the transport priorities as defined in Policy SP 3.2 are appropriate and reasonable. The comments relate to the DfI Transport Plan(s). Additional projects will be discussed with DfI, Translink and Transport Operations to ascertain viability.
LA03/DPS/0002	David Reade	SP 8	Mr. Reade welcomes the sound spatial planning approach under Policy SP 8.7 and SP 8.8 regarding the 7 SLPAs proposed including Drumadarragh Hill.	No specified modification.	Support noted and welcomed.
LA03/DPS/0002	David Reade	DM 45	Mr. Reade supports the Spatial Framework for wind energy development.	No specified modification.	Support noted and welcomed.
LA03/DPS/0003	Department of Education	Whole Plan	The Department of Education considers the Plan to be sound.	No specified modification.	Support noted and welcomed.
LA03/DPS/0004	Lindsay Martin	SP 2	Mr. Martin indicates support for Nutts Corner SEL and policy approach.	No specified modification.	Support noted and welcomed.
LA03/DPS/0004	Lindsay Martin	Site Specific	Mr. Martin requests subject lands be considered for redevelopment through inclusion in SEL designation: Nutts Corner.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0005	Richard Martin	SP 2	Mr. Martin indicates support for Nutts Corner SEL and policy approach.	No specified modification.	Support noted and welcomed.
LA03/DPS/0005	Richard Martin	Site Specific	Mr. Martin requests subject lands be considered for redevelopment through inclusion in SEL designation: Nutts Corner.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0006	Henry Boyd	Site Specific	Mr. Boyd requests subject lands be considered for housing development; Ballynure.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0006	Henry Boyd	Site Specific	Mr. Boyd requests subject lands be considered for housing development; Roughfort.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0006	Henry Boyd	Whole Plan	Mr. Boyd considers the plan to be sound.	No specified modification.	Support noted and welcomed.

LA03/DPS/0007	Co-Ownership Housing Association	SP 4	<p>NICHA welcomes Policy SP 4 as it considers this will add to the delivery of affordable housing in the Borough.</p> <p>NICHA states that the draft Plan Strategy does not make reference to a definition of Affordable Housing and considers that it is important for a definition to be included in the LDP or referenced to a definition elsewhere to aid clarity for stakeholders as well as taking on board that the definition may change over time e.g. to reflect potential new affordable housing products, such as Rent to Own.</p> <p>NICHA advises that the tenure mix of affordable housing is vital and that it is important to know how many units will be used for shared housing and how many for social housing with flexibility built into the process.</p> <p>NICHA advises that there are differing views on whether affordable units should be pepper potted or clustered within housing developments and considers that appropriate flexibility should be provided in the DPS, in particular where both apartments and housing are proposed. Suggests that it would be preferable for the DPS to state "where possible and practical" affordable housing units should be dispersed throughout the development.</p> <p>1 of 2</p>	<p>Whilst there is no specified modification to a particular Policy, NICHA suggests that it would be preferable for the DPS to state "where possible and practical" affordable housing units required as part of a private housing development should be dispersed throughout the development. NICHA also requests that a definition of Affordable Housing be included in the LDP or a cross-reference to a definition elsewhere included.</p>	<p>Support noted and welcomed.</p> <p>No change required in relation to Policy DM 17.3 and 17.4 on Affordable Housing. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council considers that the assessment of proposals for affordable housing, including issues around 'pepper potting', design and the use of S76 agreements, is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations. It should however be noted that as indicated in SP 1.17 the Council intends to bring forward Supplementary Planning Guidance to explain in greater detail how developer contributions will be implemented through the planning process. This will include consideration of and more information on the provision of Affordable Housing.</p> <p>Whilst the DPS does not make a specific reference to a definition of Affordable Housing, Evidence Paper 6 para. 6.3 indicates that affordable housing is defined as social rented housing and intermediate housing for eligible households per the current Government accepted definition in NI as included in the Strategic Planning Policy Statement for Northern Ireland (SPPS). The Council considers that given the current review of the definition of Affordable Housing currently being undertaken by the Department for Communities that it would be preferable to address this matter either in the aforementioned Supplementary Planning Guidance to be drawn up on this matter or through a revision of the SPPS.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>
LA03/DPS/0007	Co-Ownership Housing Association	SP 4	<p>2 of 2</p> <p>Affordable units should not be built in such a way that they are unaffordable. They should be of a sufficient standard and not of a lesser specification than market housing, e.g., should conform to lifetime homes standard or current industry standard.</p> <p>The NICHA representation provides significant detail on the potential operation of Affordable Housing planning policies linked to consideration of how Section 76 agreements should be employed to help increase the supply of affordable housing across NI.</p>	see above	see above
LA03/DPS/0007	Co-Ownership Housing Association	DM 18 G	<p>NICHA welcomes the policy as it will add to the delivery of affordable housing in the Borough.</p>	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	Introduction	<p>NIHE would like to see further information included on how prematurity would be applied. Application of prematurity is supported by the SPPS and Joint Ministerial Statement (JMS).</p> <p>NIHE believe the JMS remains a material consideration in the determination of planning applications. NIHE understand that whilst there is no presumption that a LDP is sound, the option to apply prematurity is still included within the SPPS. NIHE believe the DPS could be a material consideration in the determination of planning applications, as the extant plans are now out of date.</p>	No specified modification.	<p>No change required. The transitional arrangements relating to the LDP is set out in para. 1.12 to 1.17.</p> <p>The Council acknowledges that advice on prematurity is set out in para. 5.73 of the SPPS and considers this is a matter to be taken forward through the normal Development Management process.</p>

LA03/DPS/0008	NIHE	Setting the Context	NIHE would like to see reference made to Lifetime Opportunities - Central Government's Anti-Poverty and Social Inclusion Strategy for Northern Ireland, as the DPPN 1 states this to be a central strategy that a Council must have regard to in formulating LDPs. NIHE believe that mixed tenure development, and an adequate supply of affordable and accessible housing, as well as balanced communities have a key role to play in the elimination of poverty and social exclusion.	Whilst there is no specific modification NIHE requests reference be made to the Lifetime Opportunities - Government's Anti-Poverty and Social Inclusion Strategy for Northern Ireland.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor factual change in response to the representation for the purposes of clarification to make the Council's position clear that the Lifetime Opportunities document was considered in the preparation of the DPS. The wording change does not introduce any new policy concept as the document is already published and available. It is clear when the DPS and its evidence base are read together that the Council has considered the principles of this document.</p> <p>The Council made clear in paragraph 2.5 of the DPS that there were a large number of other Government Strategies and Plans, that whilst not specifically referenced in the DPS, had nevertheless been taken into account in the preparation of the DPS document.</p> <p>The Council has also demonstrated that it considered the document as set out SP 4.9, DM 17, para 7.39 and 7.71 of the DPS as well as in the SA Scoping Report on page 147.</p> <p>Suggested minor change at para. 2.5, page 26, "...other Government Strategies and Plans, such as the Biodiversity Strategy for Northern Ireland and 'Lifetime Opportunities', the Government's Anti-Poverty and Social Inclusion Strategy that, whilst..."</p>
LA03/DPS/0008	NIHE	Setting the Context	<p>NIHE consider that the ability for all to be housed in an adequate home is a necessary prerequisite to achieve the objectives of the Council's Community Plan, including the goal "our vulnerable people are supported" and its 4 outcomes.</p> <p>NIHE refers to the United Nations definition of an adequate home and believe that the housing policies in the LDP should aim to ensure that new residential developments provide adequate homes, as defined by the UN, for all in the Borough.</p>	No specified modification.	<p>No change required. The Council considers the housing policies as drafted to be appropriate and reasonable and have taken account of the provisions of the RDS and SPPS. The rationale for the policies are provided in the text "Why we have taken this approach" and "Why we have this policy".</p> <p>The Council considers the policies included within the Homes Section of the DPS will assist in the provision of 'adequate' homes. This includes Policies SP 4, DM 17 and DM 18.</p>
LA03/DPS/0008	NIHE	Setting the Context	<p>NIHE state that reducing inequality is of particular pertinence to the Borough as the NIMDM 2017 indicates that "there are considerable inequalities throughout our Borough and approx. 19% of our Borough's residents suffer from a long-term health problem or disability".</p> <p>NIHE support the statement that the LDP has an important role to play in facilitating a reasonable mix and balance of housing tenures and types, in the overall provision of housing.</p>	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	Plan Vision	NIHE supports the Plan Vision, in particular welcoming the statement, 'housing availability and connectivity that meets the needs of our community'.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	Plan Vision	NIHE welcomes the statement, <i>'The LDP will also seek to encourage the delivery of affordable housing opportunities to help meet local needs, and ensure a diverse choice of housing for an ageing and changing population'</i> .	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	Strategic Objectives	NIHE indicate general support for the strategic objectives, and whilst welcoming Strategic Objective 8, would like it to explicitly mention "affordable housing within a mixed tenure environment".	Request SO 8 to explicitly mention "affordable housing within a mixed tenure environment".	No change required. The Council considers the strategic objective as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. Section 3 of the DPS sets out the context in which objectives were prepared. A diverse choice of housing and the strengthening of community cohesion covers the approach to affordable housing. This is carried forward in the DPS with policies in Section 7 i.e. Policies SP 4, DM 17 and DM 18. which set out policy in relation to affordable housing.
LA03/DPS/0008	NIHE	Strategic Objectives	NIHE indicate support for Strategic Objectives 9-14.	No specified modification.	Support noted and welcomed.

LA03/DPS/0008	NIHE	SP 1	NIHE supports the approach to granting planning permission which contributes to sustainable development, whilst would like to see proposals assessed with reference to the positive and negative effects that they will have on economic , environmental and social factors. A Place making approach can ensure holistic effects of development are adequately assessed and indicates support for the precautionary principle. However considers that if a proposal may present a potential risk to health, it should not be termed as having an overriding public interest. NIHE would like to see a requirement that any adverse effects are mitigated.	No specified modification.	Support noted and welcomed. No change required. The Council considers the policy as draft is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers that the social, economic and environmental impacts of a development proposal, together with consideration with the public interest and mitigation measures, are matters to be determined through the application of the planning policies set out in the LDP through the normal Development Management process.
LA03/DPS/0008	NIHE	SP 1	NIHE consider that Health Impact Assessments should be included for major development.	Whilst there is no specific modification, NIHE request that Health Impact Assessments should be included for major development.	No change required. The Council considers the policy as drafted is reasonable and appropriate and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The application of the policy suite of the LDP as a whole, through the normal Development Management process will contribute in improving human health. Health impacts will also be assessed for those significant developments that require the submission of an Environmental Statement.
LA03/DPS/0008	NIHE	SP 1	NIHE consider that the Spatial Growth Strategy should be primarily based on the RDS Spatial Framework, rather than existing commitments. Existing commitments should not be the main factor and there should be an allowance to redefine development potential and settlement limits if planning permission lapses. NIHE welcomes approach to re-use of brownfield land but would like the Spatial Growth Strategy to refer to RDS target that 60% of housing land should be on brownfield sites within the urban footprint. Indicate support for policies SP 1.10 and SP 1.12 in relation to development in the countryside. However, NIHE consider housing in the countryside should primarily be focused on settlements.	Spatial Growth Strategy should be based on the Spatial Growth Framework rather than existing commitments. Spatial Growth Strategy should refer to the RDS 60% brownfield target.	Support noted and welcomed. No change required. The Council considers the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The SPPS para. 6.139 sets out the processes of allocating housing land including allowance for existing housing commitments. "Why we have taken this approach" on page 68 of the Plan sets out the reasoned justification for SP 1 Sustainable Development including the Spatial Growth Strategy. As such, para. 4.6 sets out the considerations the Council has taken into account including inherited growth planned for in our Borough's legacy plans. SP 4 "Why we have taken this approach" on pages 136 - 137 sets out further reasoned justification in relation to the approach taken in relation to housing growth and allocation as well as the identification of land for housing. Whilst existing development commitments based on legacy Development Plans and extant planning permissions have been an important factor for the Spatial Growth Strategy, the Council's approach to the identification of new housing land, is set out in para. 7.17 of the DPS. Further information on the background to the approach to growth is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing.
LA03/DPS/0008	NIHE	SP 1	NIHE strongly support the introduction of developer contributions and strongly welcome the inclusion of the policy provision for affordable housing. Considers this will enable government to deliver housing to match unmet housing need, help to achieve balanced communities through mixed tenure housing and would reduce need for housing association grant. This would support a larger programme of new build development thereby helping to address housing need within the District. Under the current affordable housing policy there would be limited opportunities to achieve a contribution for affordable housing. Developer contributions should also help to provide infrastructure etc.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 2	NIHE is generally supportive of economic policies.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 2	NIHE welcomes the policy focus on enterprise and employment growth within the main towns across the Borough.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 2	NIHE supports barrier-free employment locations within the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car.	No specified modification.	Noted.

LA03/DPS/0008	NIHE	SP 2	NIHE would like to see a sequential approach used to identify employment land, which directs employment to the hubs and local towns first.	No specified modification.	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council considers that Policies SP 2.2 and 2.3 already sets out a sequential test which refers to a 'Two-Tier' approach to the identification of land and premises for industry/employment activity and its subsequent retention and protection from alternative use. This approach is based on: (a) Strategic Employment Locations; and (b) Local Employment Sites. Policy SP 2.4 clearly states that the Council does not intend to identify sites for employment-related developments in the smaller settlements of the Borough.</p> <p>The DPS's evidence base for the identification of employment land is set out in Evidence Paper 3: Economic Growth. This document should be read for further information.</p>
LA03/DPS/0008	NIHE	SP 2	NIHE supports the presumption against the alternative use of land and premises within SELs and LESs.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 2	NIHE supports the retail hierarchy and town centre policies.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	Positive Planning Note: Adding Value	NIHE strongly welcome the use of social clauses to provide training and employment opportunities and believe this should be strengthened by being included as a DM policy.	Whilst there is no specific modification NIHE requests the introduction of a DM policy based on social clauses.	<p>Support noted and welcomed.</p> <p>No change required. The Council considers the Positive Planning Note as drafted to be appropriate and reasonable and that no specific policy is required for social clauses.</p>
LA03/DPS/0008	NIHE	DM 1	NIHE is generally supportive of the Council's economic policies.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 2	NIHE supports the policies relating to the location of economic development sites, with land within settlements being considered first before open countryside sites are investigated to protect rural character.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 6	<p>NIHE wish to increase the supply of affordable homes, including the use of Key Site Requirements (KSR) and promotion of 'Living over the Shops' (LOTS).</p> <p>Accordingly welcomes the reference to housing as an acceptable use in town centres as this promotes vitality and viability and would like to see flexibility in car parking standards for housing schemes in town centres.</p>	No specified modification.	<p>Support noted and welcomed.</p> <p>The Council considers that flexibility in the application of car parking standards for housing schemes within town centres is a matter for consideration within the normal Development Management process. The Council also considers its approach to affordable housing as reasonable and appropriate.</p>
LA03/DPS/0008	NIHE	SP 3	NIHE welcomes the promotion of accessibility and the encouragement of a modal shift away from car use towards more sustainable and active transport choices, particularly as 20% of the Borough's residents have no access to a private car.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 3	<p>NIHE agrees with the policy approach, through the protection of disused transport routes and promotion of opportunities for their reuse for transport or recreational purposes.</p> <p>Policies which support active travel can improve health and wellbeing. Disused Transport Routes or Community Greenways offer opportunities to connect people and places in more sustainable ways, promoting cycling and walking and contributing to healthier lifestyles, also opening up the countryside, attracting visitors and providing economic benefits.</p>	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 3	The NIHE supports the measures outlined in Policy SP 3.5 for the Integration of Transportation and Land Use.	No specified modification.	Support noted and welcomed.

LA03/DPS/0008	NIHE	SP 3	The NIHE considers that developments should be concentrated in locations with good access to public transport, walking and cycling facilities. Developments should be promoted which reduce car dominance in local streets, encourage pedestrian and cycle journeys and make it safer for children to walk to school and play outside. Designing developments where pedestrians and cyclists are given priority will help support better health outcomes.	No specified modification.	<p>No change required.</p> <p>The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>Policies in the LDP should be read together. This is made clear in Policy SP1, Positive Planning Note on page 11 and para. 1.5. There are a range of policies within the LDP which seek to encourage the integration of transportation and land use, encourage a modal shift from the private car to walking ,cycling and public transport and support good design where the people, not vehicle movement, are the primary focus (Policies SP1, SP 3, DM 12. SP 6, DM 25).</p>
LA03/DPS/0008	NIHE	DM 10	The NIHE would like to see some flexibility in the application of parking standards in affordable housing schemes due to lower car ownership levels for social housing, than other tenures of development (56% of social housing tenants do not have access to a car, compared to NI average of 20%).	No specified modification.	<p>No change required.</p> <p>The Council considers the policy as drafted to be appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that flexibility in the application of car parking standards for affordable housing schemes is a matter for consideration within the normal Development Management process.</p>
LA03/DPS/0008	NIHE	DM 12	The NIHE considers that designing developments where pedestrians and cyclists are given priority will help support better health outcomes.	No specified modification.	Noted.
LA03/DPS/0008	NIHE	SP 4	<p>NIHE indicates that under the text for 'Housing Growth and Allocation and Identification of Land for Housing' there is no reference to the Housing Needs Assessment, as the RDS and SPPS clearly state that HNA is a factor used to inform the allocation of housing land.</p> <p>NIHE considers that the HNA should be used as an evidence base to support an increase in a housing allowance in the DPS above the HGI level.</p>	No specified modification.	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>The Council has taken into account the HNA prepared by NIHE as part of this process as demonstrated in para. 2.45 and SP 4.8 of the DPS and also as set out in Evidence Paper 6 Housing which specifically references the HNA . The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>
LA03/DPS/0008	NIHE	SP 4	NIHE considers the proportion of housing allocated to the rural area (13.3%) at its current level is unlikely to support the creation and maintenance of sustainable rural communities.	No specific modification but requests the allocation of a greater proportion of housing to the rural settlements (villages and hamlets) with a lesser proportion to the open countryside.	<p>No change required. It is considered that the housing allocation proposed for the Borough is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Evaluation Framework and the role and function of settlements.</p> <p>The allocation of housing growth estimated for the open countryside (750 units) over the plan period is based on an analysis of recent build rates as a consequence of the regional policy direction identified within the SPPS and broadly carried forward through the provisions of Policy DM 18.</p> <p>The allocation of housing growth to villages and hamlets is considered appropriate and reasonable to facilitate ongoing needs of the settlements in accordance with the Plan's Spatial Growth Strategy.</p> <p>The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0008	NIHE	SP 4	<p>NIHE Indicates that affordable housing need in Crumlin is currently 50% of the housing growth allocated. Should the level of affordable housing be delivered, this would represent a high concentration of social housing in one location, undermining the aim of mixed tenure housing and balanced communities.</p> <p>Without a proportionate increase to housing growth in Crumlin, NIHE believe this would not facilitate a mix and balance of tenures which the SPPS requires.</p>	No specified modification.	<p>No change required. It is considered that the 350 unit housing allocation proposed for Crumlin is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Crumlin. It is considered that an increase in the overall housing allocation to Crumlin would be at odds with the considerations identified above.</p> <p>While the SPPS directs that the Housing Needs Assessment be taken into account and the LDP be the primary process to facilitate delivery of affordable housing through zonings and KSRs , the Council considers that it is not the role of LDP to facilitate the delivery of 100% of the affordable housing need.</p> <p>The evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0008	NIHE	SP 4	<p>NIHE welcomes the statement that where new housing land is required, preference will be given to previously developed land.</p> <p>Would like to see a statement to include NIHE land where housing units have been demolished and grassed over.</p>	No specified modification.	<p>Support noted and welcomed.</p> <p>Whilst the details of the Strategic Urban Capacity Study have been included within Evidence Paper 6: Housing, it is considered that due to the site-specific nature of this issue, it is a matter to be dealt with in more detail at the forthcoming Local Policies Plan stage of the LDP process, which will consider site specific designations and zonings.</p> <p>The assessment of proposals for affordable housing on NIHE lands will continue to be taken forward through the normal Development Management process.</p>

LA03/DPS/0008	NIHE	DM 17	<p>NIHE objects to the policy threshold for Lifetime Homes, requiring developments of 20 units or greater to provide 20% as Lifetime Homes.</p> <p>The policy also confuses the provision of Lifetime Homes with wheelchair units.</p>	<p>Considers that Lifetimes Homes should be a requirement for all new developments rather than a proportion of schemes over 20 units and that a proportion of wheelchair standard units are required.</p> <p>Replace the word 'encourage' with 'adopt' within para. 7.39.</p>	<p>Open to minor change.</p> <p>The Council considers that the policy as drafted is appropriate and reasonable and has taken into account the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that the 16 design criteria for Lifetime Homes, contain measures which aim to improve the level of wheelchair accessibility within new housing units in the Borough. The Council considers the threshold to be reasonable after consideration of other representations on this matter.</p> <p>The Council is suggesting the following minor change in response to the representation for the purposes of clarification that reference to facilitation of wheelchair accessibility is in relation to the application of the Lifetime Homes approach as opposed to provision of wheelchair units. This minor change does not introduce a new policy concept as the policy principle of Lifetime homes is already established in the policy. It is clear when the plan and its evidence base are read together that the DPS references and takes forward the principles of the Lifetime Homes approach e.g. SP 4.9, DM 17, para 7.39 and 7.71.</p> <p>Suggested minor change at DM 17.1(d), page 143 "...approach which helps facilitate wheelchair accessibility."</p>
LA03/DPS/0008	NIHE	DM 17	<p>NIHE objects to the level of affordable housing which can be provided at the proposed policy threshold to meet need. Considers a lower threshold should be included for affordable housing policy to address affordable needs, especially in rural areas.</p> <p>Considers that policies SP4 Homes and DM 17 Homes in Settlements do not contribute to furthering sustainable development as required by The Planning Act (NI) 2011; do not contribute to the draft PFG indicators; are contrary to the RDS and SPPS in not addressing affordable housing need; the policies are not capable of meeting Strategic Objective 8. Concern that the DPS does not adhere to the principles originally stated in POP. As the DPS for affordable housing will mean there is a significant shortfall in sufficient land to meet affordable housing need, there is no indication that NIHE representations to the POP, subsequent papers, correspondence and evidence has been given appropriate weight or have helped shape the policies in the DPS. As there is a significant shortfall expected from the affordable housing policy versus needs, the evidence base used for the preparation of the draft policies is lacking.</p> <p>Would like to see a commitment from Council that any shortfall will be addressed at LPP stage.</p>	No specified modification.	<p>No change required. The Council considers that the policy threshold in relation to Affordable Housing is appropriate and reasonable and has taken into account the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>
LA03/DPS/0008	NIHE	DM 17	NIHE support the policy provisions for the requirement of open space both public and private in new residential developments.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 17	NIHE support the policy provisions for the requirement of open space both public and private in new residential developments.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 17	NIHE support the promotion of Town Centre Living initiatives, including LOTS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 18 G	NIHE support the aim of the policy and the retention of the rural exceptions policy where need has been identified. Considers that the Policy will provide flexibility where need arises.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 20	NIHE welcomes the policy to ensure that the accommodation needs of Travellers are adequately catered for.	No specified modification.	Support noted and welcomed.

LA03/DPS/0008	NIHE	DM 21	NIHE welcomes the policy to ensure that the accommodation needs are met of those individuals whose needs cannot be readily met through the provision of general housing. Considers that Policy DM 21 should acknowledge that supported housing schemes should be prioritised within the development management process and flexibility applied in the application of residential design standards due to the specific nature of supported accommodation.	No specified modification.	Support noted and welcomed. The Council considers that all planning applications should be processed on an equal basis with a view to achieving the established statutory performance targets. The Council considers that the assessment of proposals for supported housing schemes in terms of design is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0008	NIHE	DM 22	NIHE support the criteria within the policy in relation to residential extensions.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 5	NIHE supports these policies to provide good quality, accessible community infrastructure/facilities and to protect areas of existing open space. Open space is important in the creation of sustainable communities, as it is greatly beneficial to people's health and wellbeing and encourages community cohesion. NIHE supports the use of landscape strategies within residential developments to ensure that open space is adequate, well designed and is well integrated as part of the development.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 5	NIHE considers new development should usually conserve wildlife habitats, existing trees and quality vegetation. It should promote biodiversity by providing open space with uncultivated areas and green corridors. It should also consider the creation of allotments and community gardens, which can encourage healthier lifestyles. Planting of native species in housing developments should also be encouraged, including the promotion of tree-lined streets.	No specified modification.	No change required. The Council considers the existing policy as appropriate and reasonable and has actively sought to promote biodiversity. The Council is however open to minor changes for the purposes of clarification in relation to biodiversity and trees in development.
LA03/DPS/0008	NIHE	DM 23	NIHE strongly welcomes the acknowledgement in para. 8.18 that social housing is a "significant community benefit", however in the interests of consistency with other policies within the DPS, requests a change to the para. wording from "social housing" to "affordable housing". Refers to SPPS definition that affordable housing refers to social and intermediate housing and would like to see the SPPS definition used consistently within the Plan, or in line with any new definition determined by DfC, which is the subject of a recently opened consultation exercise (Definition of Affordable Housing Consultation Paper, DfC June 2019).	Para. 8.18: Replace wording 'social housing' with 'affordable housing'.	Open to minor change. The Council is suggesting the following minor change in response to the representation to clarify that affordable housing, which includes social housing, would generally be viewed as providing significant community benefit where a demonstrable need can be established. This does not introduce a new policy concept as the principle of affordable housing is already established in the Plan and the role of social housing is already referenced as a community benefit in this particular section. The amended text simply seeks to clarify social housing as an element of affordable housing in this context. Affordable housing is currently defined in regional policy (e.g. RDS 2035 Glossary of Terms and SPPS footnote 41 page 73). The Council is also aware of the Department of Communities consultation regarding the definition of affordable housing. Suggested minor change at para. 8.18, page 175 "Examples of significant...may include the provision of affordable housing where a demonstrable local need...."
LA03/DPS/0008	NIHE	DM 23	NIHE requests the retention/adoption of the NIHE and DoE Joint Protocol for the operation of open space exception policy in PPS 8, to provide guidance for all stakeholders on the approach when implementing an exception to this policy (Policy DM 23.2).	No specified modification but NIHE requests the retention of NIHE and DoE Joint Protocol for operation of open space exception policy in PPS 8.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The assessment of proposals for affordable housing on NIHE lands will continue to be taken forward through the normal Development Management process. The Council is content to engage separately with NIHE regarding the need for and content of any supplementary guidance in support of Policy DM 23 insofar as it relates to the NIHE estate.
LA03/DPS/0008	NIHE	DM 24	NIHE welcomes the reference in para. 8.27 to the requirement for developer contributions towards the demand arising from new or enhanced community infrastructure as a result of new development.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 6	NIHE welcomes the adoption of a Placemaking approach to development as this can lead to successful places. NIHE supports a "fabric-first" approach to energy efficiency in new developments and believes that new homes should be designed to be energy efficient, low carbon, water efficient and climate resilient.	No specified modification.	Support noted and welcomed. The Council wishes to encourage sustainable design solutions that will help to mitigate against climate change and increase environmental resilience, see Positive Planning Note on page 283 and have also addressed such issues under Policy DM 25.1 (l to p), Policy DM 47.4 and DM 47.5.

LA03/DPS/0008	NIHE	SP 6	NIHE supports the policy requirement for the submission of Design and Access Statements, however would like to see this requirement applied to all residential development proposals, rather than those for 10 dwellings or more. This would help to encourage the submission of high quality, well designed proposals from the onset.	Amend Policy SP 6.4 to require a Design and Access Statement (DAS) for all residential developments.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council considers the threshold outlined in Policy SP 6 for submission of a DAS for larger scale proposals is reasonable having regard to local circumstances and taking account of the current legislative requirements of Article 6 of The Planning (General Development Procedure) Order (Northern Ireland) 2015.</p> <p>Requiring a DAS for all residential development in the Borough or indeed across Northern Ireland, is considered to be a matter for DfI, through the amendment of relevant legislation.</p>
LA03/DPS/0008	NIHE	SP 6	NIHE welcomes the Positive Planning Note 'Adding Value' and consider community involvement in the development process will provide an opportunity to shape the development of a place to ensure that it meets community needs.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 25	NIHE welcomes Policy DM 25.1. NIHE however would like to see more detail added to this policy. Developers should be expected to demonstrate that measures to reduce energy consumption and incorporate sustainable design solutions have been considered and incorporated into their proposals.	Amend Policy DM 25.1 to require developers to demonstrate that measures to reduce energy consumptions and incorporate sustainable design solutions have been considered and incorporated into their proposals.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>Policy DM 25.1 (n)-(p) already seeks a range of measures to promote greater environmental resilience including the appropriate integration of sustainable energy measures. The Council also wishes to encourage the incorporation of sustainable design solutions in new developments (see Positive Planning Note page 283), but considers that a number of the suggestions made e.g. the need for greater energy efficiency and climate resilience, are matters that would apply across the region and should preferably come forward through amendments to the NI statutory building control regime.</p> <p>Evidence Paper 21: Placemaking and Good Design sets out the evidence base in relation to the topic within the Borough and includes a summary of the 'Living Places Urban Stewardship and Design Guide', supplementary planning guidance. This guidance incorporates an understanding of how good design and successful places can meet the challenges climate change and as set out in policy DM 25.2, all development proposals should demonstrate how they have taken this guidance into account.</p>
LA03/DPS/0008	NIHE	DM 25	NIHE supports the requirement in paragraph 9.17 for development to demonstrate ways in which it is responsive to the threat of climate change.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 25	NIHE welcomes the requirement in Policy DM 25.2.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 7	NIHE supports the policies that protect the built environment and heritage.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 8	NIHE supports the policies that protect our natural heritage assets and resources.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 8	NIHE welcomes the Positive Planning Note, however is unsure what weight this can be given in the Development Management process. Would like to see this and other Positive Planning Notes embedded in planning policy.	To embed the Positive Planning Note into policy.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the strategic policy is provided in the text 'Why we have taken this approach'.</p> <p>The Council considers the Positive Planning Notes will add value to the planning process within the Borough, however it is not considered that it is necessary to incorporate these as policy requirements.</p> <p>Positive Planning Notes are for information purposes to add value to the LDP.</p>
LA03/DPS/0008	NIHE	DM 42	NIHE strongly welcomes Policy DM 42 and would like the policy to encourage tree lined streets within new developments, which will achieve the aim set out in paragraph 11.47.	No specified modification.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to acknowledge one key way that new tree planting can be integrated into developments. This does not introduce a new policy concept as the importance of trees and development is already established in a number of policies including DM 42 itself, DM 25 and DM 27.</p> <p>Suggested minor change at DM 42.1 (a), page 256 "(a) Promote additional tree planting...native species planting and that seek to incorporate tree-lined streets in the layout."</p>
LA03/DPS/0008	NIHE	DM 42	NIHE welcomes that Policy DM 42.3 allows the Council to require supplementary replacement planting. NIHE advise that applicants are removing trees before submitting a planning application, therefore would like to see conditions attached to planning permission requiring supplementary tree planting.	No specified modification.	<p>Support noted and welcomed.</p> <p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy".</p> <p>The removal of trees that are not protected by a Tree Preservation Order or by planning conditions is outwith planning control. The use of conditions for new or supplementary tree planting in association with development proposals will be assessed in accordance with Policy DM 42 as part of the normal Development Management process.</p>
LA03/DPS/0008	NIHE	SP 9	NIHE supports maximising the opportunities to develop renewable energy generation facilities in appropriate locations.	No specified modification.	Support noted and welcomed.

LA03/DPS/0008	NIHE	DM 45	NIHE supports maximising the opportunities to develop renewable energy generation facilities in appropriate locations.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 10	NIHE welcomes the DPS response to dealing with the issue of climate change and environmental challenges, i.e. greenhouse gas emissions, waste production, land contamination and flooding.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 10	NIHE supports the integration patterns of development and transport which reduce the need to travel, to promote connectivity and modes of active travel, as well as being more sustainable through a reduction in the use of private cars and travel times.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	SP 10	NIHE welcomes Policy SP 10 Positive Planning Note: Adding Value i.e. future proofing development to help mitigate against climate change and increase environmental resilience. NIHE supports a 'fabric-first' approach to energy efficiency in new development. Request for more detail in Positive Planning Note and for it to be included within policy wording.	Request for more detail in Positive Planning Note and for it to be included within policy.	Support noted and welcomed. No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that the assessment of proposals incorporating sustainable design solutions is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS (Policies SP 1.1-1.3), relevant guidance and other material considerations. All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Whilst the Council wishes to encourage the incorporation of sustainable design solutions in new developments (see Positive Planning Note, page 283), it considers that many of the suggestions made e.g. the need for greater energy efficiency and climate resilience, are matters that would apply across the region and should preferably come forward through amendments to the statutory building control regime.
LA03/DPS/0008	NIHE	DM 46	NIHE welcomes the policies which provide criteria for development on flood plains, flood risk management and flood prevention, so that new development does not increase the risk of flooding. Also supports that the precautionary approach taken in PPS 15, is included in the DPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 47	NIHE welcomes the promotion of the use of Sustainable Urban Drainage Systems and the need for drainage assessments to be provided for all new residential developments in areas where there is evidence of/potential for surface water flooding, and in other circumstances as specified within the policy.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 48	NIHE welcomes the policies that provide criteria for development on flood plains, flood risk management and flood prevention so that new development does not increase the risk of flooding. Also supports that the precautionary approach taken in PPS 15, is included in the DPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 49	NIHE welcomes policies that provide criteria for development on flood plains, flood risk management and flood prevention so that new development does not increase the risk of flooding. Also supports that the precautionary approach taken in PPS 15, is included in the DPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 50	NIHE welcomes the policy. The impacts and dangers associated with air pollution are becoming increasingly recognised.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 51	NIHE supports Policy DM 51: Major Hazards.	No specified modification.	Support noted and welcomed.
LA03/DPS/0008	NIHE	DM 52	NIHE supports the policy, recognising that site investigations and risk assessments with remediation measures where necessary, are important to ensure there is no unacceptable risk to health or the natural environment as a result of development, particularly on brownfield land.	No specified modification.	Support noted and welcomed.

LA03/DPS/0008	NIHE	Monitoring	NIHE consider the Indicative Monitoring Framework should include housing approvals in the open countryside as an indicator, to ensure they do not exceed 40%.	Include housing approvals in the countryside as an indicator.	No change required. This is already included as a Indicative Monitoring Framework indicator for Policy SP 4 'Homes' : "The number of new homes completed in the Borough by settlement and in the countryside" (page 316 of the Plan).
LA03/DPS/0008	NIHE	Monitoring	NIHE welcomes of inclusion the number of new homes delivered by tenure as an indicator. Suggest inclusion of the NIHE Housing Needs Assessment as an indicator over the monitoring period.	Include NIHE's Housing Needs Assessment as a monitoring indicator.	Support noted and welcomed. The Council considers that the indicators provided for homes are appropriate and reasonable and have taken account of the RDS and SPPS. In undertaking monitoring of the DPS the Council will also have regard to other information sources, such as the NIHE Housing Needs Assessment, in assessing the information derived from the indicators.
LA03/DPS/0008	NIHE	Monitoring	NIHE welcome the inclusion of an indicator to measure the number of Lifetime Homes. Request that the number of Wheelchair Units approved is also included as an indicator.	Include number of wheelchair units approved as a monitoring indicator.	No change required. The Council has prepared an Indicative Monitoring Framework which includes an indicator for Policy SP 4 'Homes' : "The number of planning applications for 20 dwellings or more that include a proportion of the dwellings designed to 'Lifetime Homes' standard" (page 316 of the Plan). The Council considers that this is reasonable and appropriate.
LA03/DPS/0008	Housing Executive	Miscellaneous	NIHE notes that the LDP Timetable is out of date.	No specified modification.	Noted. The DPS was published in Quarter 1 of business year 2019-2020. At that time DfI has advised all Councils that publication of a DPS three months either side of the estimated date as set out in the Council's Timetable would be acceptable. The Council met this target and will continue to keep the LDP Timetable under review and the Local Development Plan progresses. A new Timetable was published in October 2020.
LA03/DPS/0008	Housing Executive	Miscellaneous	NIHE state that the Council did not engage with them to assist in the formulation of alternative strategies and options within the POP especially in relation to meeting housing need . The Council did not consider the Housing Executive's submission to ANBC POP as evidenced in the Council's Preferred Options Paper Public Consultation Report June 2019. No indication that any subsequent papers, correspondence and evidence provided by the Housing Executive have been given appropriate weight or have helped shape the policy proposal in the DPS.	No specified modification.	Noted, however the Council strongly disagree with this statement. The Council has proactively engaged with the Housing Executive on the progression of the LDP since the transfer of planning powers. In relation to the POP, the Council wrote to all statutory consultees in advance of publishing the POP for the purposes of generating alternative strategies and options. NIHE also attended the work shop held in November 2016 where the Council engaged with a number of consultees prior to publication of the POP for the purposes of feedback before publication. Following publication of the POP, the Council published an Interim Consultation Report which was an early indication of the main issues raised and references developer contribution policy for affordable housing etc. It was replaced by the Preferred Options Paper Consultation Report published alongside the DPS in June 2019. The Council's position on the NIHE POP submission is on page 116 of this report. In addition, the Council met with Senior Officers from the NIHE on a regular basis to discuss policy areas of mutual concern and jointly attended the Belfast Metropolitan Area Spatial Working Group on cross boundary - regional housing policy issues. The Council has published Topic Paper 2 Affordable Housing which gives an update on the Council's position on affordable housing. This document should be read for further information.
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	SP 1	DfE MAPB/GSNI welcomes the Council's objectives in terms of sustainable development. Suggests the Council may wish to consider in the Local Policies Plan how growth in homes and infrastructure could be managed sustainably by seeking an appropriate balance of the use of both new construction minerals and recycled materials where possible .	Has requested consideration at the LPP stage.	Open to minor change. The Council is suggesting the following minor change in response to the representation to highlight the positive benefits associated with the use of renewable energy resources and recycled materials. The changes suggested do not introduce a new policy concept. The introduction of the suggested Positive Planning Note simply draws attention to the variety of renewable energy resources available across the Borough. Positive Planning Notes are not operational planning policy but indicative of good practice and advice that the Council wishes to encourage. The importance of the Borough's natural resources is already established in SP 12 of the DPS and is referenced in Evidence Papers 12 Minerals and 13 Renewables. Suggested minor change insertion after SP 9 'Why we have taken this approach', page 264, "Positive Planning Note – Adding Value: Our Borough has good potential to accommodate further renewable energy schemes in appropriate locations harnessing natural resources such as the sun and wind. The potential also exists across the Borough, and in particular around Antrim and to the north west of Mallusk, for the use of both shallow and deep geothermal energy resources for the production of heat, and possibly electrical power, including at a commercial scale. To promote greater sustainability in new development, the Council encourages developers to examine the potential for renewable energy to be incorporated into their schemes, for example through the use of solar panels or ground source heat pumps. The sustainability of development schemes will also be improved through the use of an appropriate balance of new construction materials and recycled materials wherever feasible."
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	SP 4	DfE MAPB/GSNI indicates that with a proposal to build at least 9,750 new homes over the Plan period consideration should be given to the sourcing of the new raw materials and improving understanding of the local supply and demand position through engagement with the local industry to ensure Local Plan Policies are sound. Sustainability will be improved by the use of new and recycled materials. The Council should consider to the potential for geothermal energy in the siting of large housing developments within Local Plan Policies.	Has requested consideration at the LPP stage.	No change to policy required. Whilst the DPS includes policies in relation to recycling, the Council considers that the issue of the sourcing of materials to help deliver the identified housing allocation is beyond the remit of the LDP process. In terms of the location and siting of housing developments and the potential to utilise geothermal energy, it is considered that due to the site-specific nature of this issue, it is a matter to be dealt with in more detail at the forthcoming Local Policies Plan stage of the LDP process, which will consider site specific designations and zonings. As previously stated the Council is open to a minor change at Section 12 in relation to the addition of a Positive Planning Note to highlight the use of geothermal.

LA03/DPS/0009	Minerals and Petroleum Branch, DfE	SP 7	DfE MAPB/GSNI indicates that given the geographic spread of historic monuments identified in the Council area and the protection likely to be afforded to these potential difficulties might arise for future development to meet local need for minerals.	No specified modification.	<p>No change required.</p> <p>The responsibility for the designation of Historic Monuments is the responsibility of the DfC HED. The relevant policies within the DPS will be applied to any development proposals affecting such designations, including mineral development, and these will be determined through the normal Development Management process on a case by case basis. The Council considers that the relevant policies as drafted are both appropriate and reasonable.</p> <p>The DPS's evidence base for the Historic Environment is set out in Evidence Paper 7: Historic Environment. This document should be read for further information (Chapter 8 'Archaeological Remains - Sites and Monuments Record', pg. 19)</p>
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	SP 9	DfE MAPB/GSNI recognises the delicate balance between economic need for use of our natural resources and environmental impact. In recognising that mineral extraction by its very nature will have some adverse impact, suggests that the reference to adverse impact in Policy SP 9.1 should be qualified as 'significant' adverse impact.	Suggests that the reference to adverse impact in Policy SP 9.1 should be qualified as 'significant' adverse impact.	<p>Open to minor change. The Council is suggesting this minor change in response to the representation to clarify that the assessment of impacts that may arise in association with development proposals to use natural resources, such as minerals or renewable energy proposals, requires consideration of whether these are considered acceptable or not having regard to the overall degree of impact arising and any mitigation measures proposed. This clarification reflects the approach set out in the specific policies for Minerals Development and Renewable Energy Development set out in DM 43 and DM 45 respectively. This does not introduce a new policy concept rather it forms part of the normal Development Management process of a balanced consideration of proposals which assesses whether a development would result in demonstrable harm to interests of acknowledged importance that is not outweighed by the benefits associated with the scheme. As such the clarification suggested is supported by the core approach to sustainable development set out in SP 1 of the DPS and the approach advocated in the SPPS.</p> <p>Suggested minor change SP 9.1, page 262 "Development will be supported ... will not have an unacceptable adverse impact on the environment, amenity or public safety..."</p>
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	SP 9	DfE MAPB/GSNI welcomes the recognition of the economic importance of minerals at Policy SP 9.2 (a) and (c) as key aspects for consideration while seeking to ensure adverse impacts are mitigated. The identification and protection of important deposits is welcomed.	No specified modification.	Support noted and welcomed.
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	SP 9	DfE MAPB/GSNI welcomes the continued safeguarding of the Crumlin lignite.	No specified modification.	Support noted and welcomed.
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	DM 43	DfE MAPB/GSNI welcomes the proposed flexible and balanced approach for mineral development in Policy DM 43. Welcomes Policy DM 43.6 on site restoration and Policy DM 43.3 covering mine waste plans and the requirement for land instability reports when appropriate.	No specified modification.	Support noted and welcomed.
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	DM 44	DfE MAPB/GSNI welcomes the protection of identified mineral reserves. The continued protection of the lignite reserve at Crumlin is noted.	No specified modification.	Support noted and welcomed.
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	DM 45	DfE MAPB/GSNI advises that the Council area is fortunate in that it includes areas that are geologically suitable for use of geothermal energy. The potential for this should be considered in discussions around future development of homes and industrial sites.	No specified modification.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to highlight the positive benefits associated with the use of renewable energy resources and recycled materials. The changes suggested do not introduce a new policy concept. The introduction of the suggested Positive Planning Note simply draws attention to the variety of renewable energy resources available across the Borough. Positive Planning Notes are not operational planning policy but indicative of good practice and advice that the Council wishes to encourage. The importance of the Borough's natural resources is already established in SP 12 of the DPS and is referenced in Evidence Papers 12 Minerals and 13 Renewables.</p> <p>Suggested minor change insertion after SP 9 'Why we have taken this approach', page 264,</p> <p>"Positive Planning Note – Adding Value:</p> <p>Our Borough has good potential to accommodate further renewable energy schemes in appropriate locations harnessing natural resources such as the sun and wind. The potential also exists across the Borough, and in particular around Antrim and to the north west of Mallusk, for the use of both shallow and deep geothermal energy resources for the production of heat, and possibly electrical power, including at a commercial scale.</p> <p>To promote greater sustainability in new development, the Council encourages developers to examine the potential for renewable energy to be incorporated into their schemes, for example through the use of solar panels or ground source heat pumps.</p> <p>The sustainability of development schemes will also be improved through the use of an appropriate balance of new construction materials and recycled materials wherever feasible."</p>

LA03/DPS/0009	Minerals and Petroleum Branch, DfE	Evidence Paper 12: Minerals	DfE MAPB/GSNI acknowledges the DPS proposals are supported by a comprehensive evidence base which has taken on board comment and input from DfE and GSNI.	No specified modification.	Support noted and welcomed.
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	Evidence Paper 12: Minerals	DfE MAPB/GSNI advises, for the sake of completeness, that there is a current Petroleum Licence PL1/10 (conventional oil and gas) which covers part of the Council area.	Amend Evidence Paper.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality, this includes Evidence Paper 12: Minerals as well as the "Introduction" and "Why we have taken this approach" for Strategic Policy 9. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage. The Council also notes the position of the Department for the Economy website that "On 29 January 2020, the Administrator and Operator of Petroleum Licence PL1/10, Terrain Energy Limited, notified the Department that it wished to relinquish the licence with immediate effect. In accordance with the legislation, the licence determined (terminated) following a three-month notice period, on 28 April 2020."
LA03/DPS/0009	Minerals and Petroleum Branch, DfE	Site specific	DfE MAPB/GSNI indicates that when locating new employment zonings, sustainability could be increased if consideration is given to the potential for geothermal energy at proposed sites. Recommends that this is considered at LPP stage and would be able to advise on this matter and the favourability of the geology at proposed sites.	Has requested consideration at the LPP stage.	Noted. The Council will consider these matters at the LPP stage and welcomes opportunity to further engage with DfE MAPB/GSNI on the matter. The Council is also bringing forward a Positive Planning Note in relation to geothermal
LA03/DPS/0010	Armagh, Banbridge & Craigavon BC	SP 3	ABCBC indicates support for the policy which promotes appropriate opportunities for the re-use of disused transport routes with a presumption against development that would prejudice their reuse for transport or recreational purposes.	No specified modification.	Support noted and welcomed.
LA03/DPS/0010	Armagh Banbridge & Craigavon Borough Council	SP 8	ABCBC welcomes the active engagement with ANBC on cross boundary issues and would seek continued engagement, particularly in relation to the Lough Neagh and Lough Beg.	No specified modification.	Cross boundary support with ABCBC noted and welcomed. The Council will continue to work in partnership with ABCBC on relevant issues arising in our respective LDPs. The Council has engaged, and will continue to engage, with ABCBC on issues specifically relating to Lough Neagh and Lough Beg as part of the Lough Neagh Forum Group.
LA03/DPS/0010	Armagh Banbridge & Craigavon Borough Council	DM 40	ABCBC acknowledges the aim of Policy DM 40 in that landscape resources and features are carefully considered in assessing all development proposals. ABCBC notes the introduction of this Borough wide landscape policy and acknowledges the recognition of biodiversity improvement measures as a positive mitigation.	No specified modification.	Support noted and welcomed.
LA03/DPS/0010	Armagh Banbridge & Craigavon Borough Council	DM 40	ABCBC notes the requirement of Policy DM 40.2 and considers that it may be helpful that this requirement is supported by guidance or explanatory notes.	No specified modification.	No change required. The comment relates to guidance associated with Landscape and Visual Impact Assessment (LVIA) and does not question the principle of the policy approach. The detail of a LVIA would be dealt with at planning application stage through the normal Development Management process. The Council will however consider the need for supplementary guidance on this matter as it progresses preparation of the LDP.
LA03/DPS/0010	Armagh Banbridge & Craigavon Borough Council	DM 40	ABCBC notes the introduction of a SLPA around Lough Neagh and Lough Beg in Policy DM 40.6. ABCBC would welcome further clarification whether all three policies in DM 40.1, DM 40.3 and DM 40.6 would be applied to development proposals in the Lough Neagh/Lough Beg SLPA. ABCBC also notes further restrictions imposed on Lough Neagh/Lough Beg SLPA and would welcome further detail or amplification.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council would confirm that Policy DM 40 should be read in its entirety and as a consequence all other relevant aspects of the policy also apply to the proposed Lough Neagh and Lough Beg SLPA.

LA03/DPS/0011	David Cooper (Construction Industry Training Board NI)	SP 2	CITB NI supports the development of Nutts Corner area and potential for infrastructure improvements.	No specified modification.	Support noted and welcomed.
LA03/DPS/0012	Lightsource BP	Whole Plan	Lightsource BP considers the Plan is sound.	No specified modification.	Support noted and welcomed.
LA03/DPS/0013	Translink	SP 3	Translink requests the Council omit specific Transportation Schemes within Policy SP 3.2. Specific reference is made to the provision of additional railway halts in our Borough; Merville Garden Village and Ballymartin Park and Ride, Templepatrick.	Omit reference to specific Transportation Schemes in Policy 3.2.	No change required. The Council acknowledges that the detail of future transportation schemes will be set out in the forthcoming Transport Plan being prepared by DfI and that these will subsequently feature in the Council's Local Policies Plan. DfI published the first part of the Belfast Metropolitan Transport Plan known as the Transport Study in November 2020. The Council will continue to engage with all interested parties including Translink as both plans develop to the next stage and consider that it is appropriate and reasonable to set out the Council's priorities for future transportation investment in the Borough in the Plan Strategy document to inform the Transport Plan process.
LA03/DPS/0013	Translink	DM 11	Translink comment that direct access to Protected Routes should be permitted for public transport interchanges which, by their nature, help to encourage the use of safer and more sustainable transport. The Ballymartin Park and Ride facility is cited as a good local example.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that any proposal for a public transport interchange that entails access onto a Protected Route is a matter that can be dealt with at planning application stage through the normal Development Management process which will require the use of judgement as part of the assessment of proposals on their individual merits taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0013	Translink	Monitoring	Translink suggests the Council should consider how the achievement of 'Sustainable Development' is properly measured within the DPS Indicative Monitoring Framework.	No specified modification.	No change required. The Council considers the Indicative Monitoring Framework (IMF) as drafted for the DPS to be appropriate and reasonable. Page 313 sets out how Sustainable Development will be monitored and is supported by the remaining monitoring measures in the Plan. Also Para 14.10 indicates that as the IMF is indicative it will continue to develop over time and it will be reviewed as the Council moves towards preparation of the LPP. In addition, the Council will monitor the sustainability effects of the plan through its Sustainability Appraisal monitoring framework.
LA03/DPS/0013	Translink	Whole Plan	Translink considers the DPS takes cognisance of up to date transport studies for the Borough and promotes the increased use of sustainable transport. Translink welcome continued engagement with the Council during the preparation of the LDP.	No specified modification.	Support noted and welcomed. The Council has and will continue to liaise with DfI and key stakeholders in relation to transport planning.
LA03/DPS/0014	NOARC21	DM 53	NoArc21 considers Policy DM 53.2 fails to deal with the everyday requirement to meet the World Health Organisation Guidelines on Air Quality which the Council should adopt before all other considerations. Considers that no monitoring of air quality to any significant detail throughout the Borough is in place. NoArc21 questions, in the absence of current air quality levels, how a determination of adverse effect of any proposal can be measured. In the absence of current air quality levels queries how a determination of adverse effect of any proposal can be made. Considers that 'adverse effect' requires further definition including a measurement within the WHO guidelines. Attachments include a research article in the BMJ titled "Long term exposure to ambient air pollution and incidence" and the DEFRA Clean Air Strategy 2019.	Seeks rewording of Policy DM 53.2 as follows: "No proposal will be approved based on social and economic grounds if it is detrimental on: (a) Human health; (b) In terms of air, water, noise or light pollution; (c) On the historic environment and natural heritage assets, and (d) On neighbouring uses and the character and amenity of the surrounding area."	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". In addition, all policies within the LDP should be read together. This is made clear in Policy SP 1 and Positive Planning Note on page 11 and para 1.5. In addition, the need for relevant assessments to allow proper consideration of development schemes, including an air Quality Assessment, is set out in Policy SP 1.4. As with all planning applications, a proposal for a waste management or disposal facility must be assessed on its individual merits against the relevant policies of the LDP taking account of other material considerations which includes the benefits associated with the scheme, be these of a social, economic or environmental nature. Within this context it is for the decision maker to weigh the benefits likely to arise from a particular proposal against any adverse impacts arising in reaching a decision. As part of the normal Development Management process, consultation is undertaken with relevant expert bodies, including where necessary, the Council's Environmental Health Section. Environmental Health are required by statute to monitor air quality in the Borough.

LA03/DPS/0015	The Dunadry Community Association (DCA)	How to Use this Document	Dunadry Community Association has raised concern at the text in the Positive Planning Note and considers that the reference to other material considerations outweighing the provisions of the Plan is a 'get out clause', which seriously undermines the strength of the plan and is unwelcome. At the very least they suggest that some sound and reasoned examples of what might be considered as other exceptional material considerations should be included.	Request for the Plan to include some examples of what might be considered as 'other exceptional material considerations'.	No change required. The Council considers the Positive Planning Note as drafted is appropriate and reasonable and has taken of the provisions of the RDS and SPPS. The consideration of other material considerations in the planning process is a legislative requirement as defined in Section 6 (4) of the Planning Act (Northern Ireland) 2011. Given that material considerations are so wide-ranging, this is a matter that would be dealt with at planning application stage through the normal Development Management process. Examples of other possible material considerations include: - European policy and UK Government policy, where relevant; - the environmental impact of the proposal; - the design of the proposed development and its relationship to its surroundings; - access and provision of infrastructure; the planning history of the site; - views of consultees, including the local district council; and - public concern or support expressed on relevant planning matters. The Council may however consider the need to prepare an information note on material considerations as it progresses preparation of the LDP.
LA03/DPS/0015	The Dunadry Community Association (DCA)	Introduction	Dunadry Community Association states that in the past supplementary documents have been allowed to be ignored by planners in the decision making process and refer to Planning Circular PC 03/07 published in August 2007.	No specified modification.	No change required. The Council notes the reference to past planning decisions and would advise that this is not a matter for the LDP. The Council considers that the assessment of planning proposals is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations. Following the transfer of planning functions in April 2015 there is now local accountability in decision making, including responsibility for preparation of the LDP which should be the 'start point' for consideration of development proposals.
LA03/DPS/0015	The Dunadry Community Association (DCA)	Introduction	Dunadry Community Association, with reference to the text in Para 1.20, questions by what process was the 'positive contribution' assessed when preparing the Council's POP. Considers that past experiences have almost without exception led to the Association's expressed views not being taken on board in determining planning-related issues.	No specified modification.	No change required. The Council undertook an extensive public engagement process both pre and post POP publication, which considered a wide range of views and culminated in the publication of the POP Consultation Report in June 2019. The Council considers it has undertaken a wide ranging and positive engagement on the LDP process and would advise that is not responsible for the actions or decision making of those bodies responsible for planning prior to the transfer of most planning functions to the Council in April 2015.
LA03/DPS/0015	The Dunadry Community Association (DCA)	Setting the Context	Dunadry Community Association states it is difficult to consider how the Antrim Area Plan and its alterations can be determined to have been "an important baseline for the Council in the development of the new LDP" when this plan, and objections quoting this previous plan, were largely ignored.	No specified modification.	No change required. As the Antrim Area Plan 1984-2001 (and its alterations) is one of the extant Development Plans for the Borough, the Council would confirm it remains a key consideration for current decision making and as a consequence is an important baseline document in the development the new LDP.
LA03/DPS/0015	The Dunadry Community Association (DCA)	SP 1	Dunadry Community Association raises issues around the use of certain wording in Para (e) of the Spatial Growth Strategy with reference to the words 'suitable' and 'small-scale'. Indicates this is reflective of the use of subjective language throughout the document which is as a consequence open to wide interpretation. States that an indication should be given of numbers, housing types and density in SP 1 to be clearer, whilst other phrases need greater detail and/or definition.	No specified modification.	No change required. The Council considers the language employed in the Strategic Growth Strategy to be appropriate and reasonable. The Plan Strategy as the name suggests is a strategic document that needs to be read as a whole and following adoption will need to be read together with the Local Policies Plan which will set out in greater detail the Council's proposals for individual Places of the Borough through settlement limits and zonings as appropriate. Levels of housing growth are also set out in Table 6 on page 135 of the DPS. In addition, some of the matters referred to will be dealt with at planning application stage through the normal Development Management process which will require the use of judgement as part of the assessment of proposals taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0015	The Dunadry Community Association (DCA)	SP 4	Dunadry Community Association raises issues around the wording of Policy SP 4.2 in that it includes the words 'at least'. States that it is clear that the allocated figures are a minimum with no indication of a cap or a maximum and offers no reassurance or comfort based on previous experience of Antrim Area Plan. States that some thought should be given to including figures for a target or maximum.	No specified modification.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. The Council has also been open in its indication (see para. 7.14 and Evidence Paper 6: Housing) that potential for housing delivery, due to the level of commitments, will likely be in excess of this figure and in general housing growth will be fulfilled by land within existing settlement limits. The inclusion of the wording 'at least' in Policy SP 4.2 acknowledges this situation. Once the housing growth figure and housing allocation for the Borough have been adopted as part of the Plan Strategy, the Council will subsequently consider the sources of housing supply for each settlement in meeting these adopted figures at Local Policies Plan stage. There will an opportunity at that time for the Dunadry Community Association to consider the detailed proposals coming forward for Dunadry.

LA03/DPS/0015	The Dunadry Community Association (DCA)	SP 4	Dunadry Community Association raises concerns regarding the Northern Ireland Housing Executive and its alleged manipulation of the Housing Needs Assessment process. Asks how the Council will scrutinise the HNA process.	No specified modification.	No change required. Whilst the Council acknowledges that it must take into account the Housing Needs Assessment undertaken by NIHE as part of the LDP process, it also considers it is not its role to scrutinise the carrying out and methodology involved in the HNA process by NIHE. This matter is therefore beyond the remit of the LDP.
LA03/DPS/0015	The Dunadry Community Association (DCA)	DM 18 A	Dunadry Community Association considers that the process for determining if a land owner is actively engaged in farming must be more robust. Considers that where there are no buildings within the farm for a new dwelling to cluster, surely it is totally unacceptable for the dwelling to cluster with bordering residential dwellings. If a farmer demonstrates the need for a farm dwelling, there must be a means to prevent the granting of planning permission being converted to a quick and profitable sale.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Policy DM 18.3 (a) indicates that an application for a farm dwelling under this policy must demonstrate that it has been an established and active farm business over a continuous period of 6 years. In order to demonstrate this activity, para. 7.48 identifies a number of sources of evidence which may be used. The Council is content that these evidence sources are adequate to determine whether a farmer is actively engaged in farming activity. The Council considers that the assessment of proposals for farm dwellings, including issues around siting and attachment of conditions is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0016	Peter Morrow	SP 3	Mr. Peter Morrow considers the policy approach to parking to be unsound as Policy SP 3 fails to take SPPS guidance into account. Comments that the policy doesn't make specific reference to a Council Parking Strategy, although acknowledges that paras. 6.15 - 6.16 may cover this issue.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach" (Para. 6.13 pg. 115 refers to the Council's Car Parking Strategy). The approach to parking including the pricing and management of off-street car parking will be addressed through the Council's forthcoming Parking Strategy and forthcoming DfI Transport Plan(s). Further information on the Council's forthcoming Car Parking Strategy is published as part of the submission of documents to DfI. The Council has also published a Council Car Parking Strategy Statement for the purposes of clarification as to what the Strategy will contain.
LA03/DPS/0017	John Mulholland	SP 4	Mr. Mulholland raises an objection to further house building in Doagh and surrounding area as infrastructure is inadequate and more houses will add to congestion.	No specified modification.	No change required. It is considered that the level of housing growth proposed for Doagh is appropriate and reasonable in light of the role and function of Doagh as outlined in the DPS Spatial Growth Strategy and having regard to existing housing commitments. The impact of a proposed development on existing infrastructure will be a matter for consideration under the normal Development Management process. The evidence base for the housing allocation for Doagh is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6 Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0018	Kickham's GAC Creggan	SP 5	Kickham's GAC Creggan supports the nature and content of the DPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0018	Kickham's GAC Creggan	DM 23	Kickham's GAC Creggan support Policy DM 23 which aims to protect open space. Requests enhanced referencing to protection to include protection of playing field facilities and the accommodation of ancillary changing room facilities.	Requests enhanced referencing to protection to include protection of playing field facilities and the accommodation of ancillary changing room facilities.	No change required. The Council considers the existing policy as appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The policy applies to all open space of public value (see Policy DM 23.4) which includes outdoor sports facilities and playing fields. The policy also makes provision for development ancillary to open space use, such as changing facilities, that will enhance its use.
LA03/DPS/0019	Mid Ulster District Council	Strategic Objectives	MUDC welcomes Strategic Objective 6.	No specified modification.	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	Strategic Objectives	MUDC supports Strategic Objective 13.	No specified modification	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	SP 1	MUDC supports the Spatial Growth Strategy and indicates it is in line with the RDS.	No specified modification.	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	SP 2	MUDC notes the approach taken to employment land and proposed identification of SELs and LESs. Indicates broad support for this approach.	No specified modification.	The Council welcomes cross-boundary support from MUDC.

LA03/DPS/0019	Mid Ulster District Council	SP 2	MUDC supports the town centre first approach and application of the sequential test for any out-of-centre retail development.	No specified modification.	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	DM 9	MUDC welcomes Policy DM 9 which helps to ensure high quality considered design and promotes sustainable development.	No specified modification.	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	SP 3	MUDC supports the policy provisions of Policy SP 3.	No specified modification.	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	SP 8	MUDC welcomes the designation of Lough Neagh and Lough Beg as Strategic Landscape Policy Areas and is supportive of the associated policies. MUDC considers there to be no perceived conflict in relation to its Special Countryside Area designation.	No specified modification.	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	DM 40	<p>MUDC considers there is a potential ambiguity and seeks clarification in relation to the provisions of Policies DM 40.4 and DM 40.6.</p> <p>Policy DM 40.6 states that mineral development in the Lough Neagh/Lough Beg SLPA will be strictly limited to the sustainable development of regionally important minerals that will not impact adversely on the features or environmental assets of the Loughs or their environs.</p> <p>Policy DM 40 indicates a presumption against minerals development in SLPAs, unless it can be demonstrated, that there is a regional need for the proposed mineral that outweighs the importance of the site and appropriate restoration/mitigation measures accompany the proposal.</p> <p>MUDC supports the provisions of policy DM 40.6 (b) which facilitates low intensity recreational use or tourism proposals.</p>	Suggests amended text to clarify whether a regional need for mineral development exists in Lough Neagh.	<p>No change required. It is not considered that there is any ambiguity between the policy provisions of the DPS. The policies in the plan should be read as a whole. Policy DM 40.4 applies to all SLPAs including Lough Neagh and Lough Beg and requires that a regional need be established for minerals development. Such a regional need can be determined through the normal Development Management process. The specific advice provided for the proposed Lough Neagh and Lough Beg SLPA in Policy DM 40.6 complements this.</p> <p>The Council welcomes cross-boundary support from MUDC in relation to tourism.</p>
LA03/DPS/0019	Mid Ulster District Council	SP 10	MUDC supports the Council's strategic approach to flooding as set out in Policy SP 10.	No specified modification.	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	DM 46	MUDC supports the Council's policy approach to The Control of Development in Flood Plains as set out in Policy DM 46.	No specified modification.	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	DM 47	MUDC supports the Council's policy approach to Sustainable Drainage Systems as set out in Policy DM 47.	No specified modification.	The Council welcomes cross-boundary support from MUDC.
LA03/DPS/0019	Mid Ulster District Council	Whole Plan	MUDC advises that in relation to cross boundary issues and in line with the tests of soundness, subject to clarification on minerals development on Lough Neagh and Lough Beg, there is no perceived conflict between the DPS and Mid Ulster District Council's Draft Plan Strategy	No specified modification.	The Council welcomes cross-boundary support from MUDC and has provided clarification under the relevant policy.
LA03/DPS/0020	Mid and East Antrim Borough Council	SP 3	MEABC: Considers the Plan has no greenway policy, specifically to protect regional greenways which straddle neighbouring council boundaries.	No specified modification.	<p>No change required.</p> <p>Whilst the Council does not have a specific Greenway Policy, it considers that this issue is adequately covered through Policies SP 3 (SP 3.2) and SP 5, and that the site specific outworking's of these policies will be considered at the Local Policies Plan Stage.</p>

LA03/DPS/0020	Mid and East Antrim Borough Council	SP 8	MEABC notes that unlike the Mid and East Antrim Draft Plan Strategy, ANBC has chosen not to delineate the boundaries for strategic spatial designations in the countryside at this stage of the plan process. MEABC reserves the right to comment further on such strategic matters at the Local Policies Plan stage.	No specified modification.	Noted.
LA03/DPS/0020	Mid and East Antrim Borough Council	Whole Plan	MEABC advises that there is no significant overall conflict with the emerging Mid and East Antrim draft Plan Strategy.	No specified modification.	Support noted and welcomed as well as confirmation from MEABC that there is no significant conflict with their respective LDP.
LA03/DPS/0021	John Doherty	SP 2	The identification of BIA SEL is welcomed by Mr. John Doherty.	No specified modification.	Support noted and welcomed.
LA03/DPS/0021	John Doherty	SP 2	Mr. John Doherty considers the DPS needs to recognise that the airport and its hinterland are inextricably linked. The DPS is too prescriptive and presumes in the favour of BIA Ltd. It is important that the future is not constrained by slavishly adhering to the Airport Masterplan 2030, creating a monopoly situation.	No specified modification.	No change required. Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". In relation to the land to be included at the BIA Strategic Employment Location, due to the site specific nature of this issue this is a matter to be dealt with at Local Policies Plan Stage which will consider settlement limits, site specific designations/boundaries and the zoning of land. The DPS's evidence base for Strategic Employment Locations is set out in Evidence Paper 3: Economic Growth. This document should be read for further information.
LA03/DPS/0021	John Doherty	Site Specific	Mr. John Doherty considers that abundant opportunities exist for additional SELs at the airport, which can facilitate local road improvements. Unspecified lands should be included within BIA SEL.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0022	Mrs Amanda Johnston	SP 4	Mrs. Johnston considers that the DPS recognises some of the development needs of Antrim. Accordingly there is great housing demand in Antrim and it is a popular and sought after location.	No specified modification.	Support noted and welcomed.
LA03/DPS/0022	Mrs Amanda Johnston	Site Specific	Mrs. Johnston requests that unspecified lands at the A26 towards the Dunsilly roundabout should be included for housing development, potentially for affordable housing.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue, this is a matter to be dealt with at the Local Polices Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0023	Antrim Agri Fertilisers Ltd (One2One Planning Ltd)	DM 2	Antrim Agri Fertiliser Ltd considers that the DPS has not considered the Borough's unique circumstance, in line with the SPPS and is not consistent with the DPS Spatial Growth Strategy. Raises concern that Policy DM 2 leaves a void regarding the development for the 'brownfield' sites previously used as WW2 airfields and cannot therefore be counted as an extension to the existing enterprise or have a business need case under DM 2.7. Considers that Policy DM 2.6 should be amended to allow for the redevelopment of old buildings and bunkers within those portions of these countryside industrial areas which are covered in old airfield hardstanding or outside storage but are not currently in an established employment use.	DM 2.6 should be varied along the lines of 'The Council will support proposals for the expansion <i>or redevelopment</i> of an established rural enterprise <i>or the redevelopment of vacant buildings and bunkers within the brownfield sites previously used as WW2 airfields for industrial or business use within the confines of the existing site subject to normal planning and environmental criteria</i> .'.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the policy provides sufficient flexibility to facilitate opportunities for appropriate economic development at these established rural enterprises, including those that previously operated as WW2 airfields, whilst at the same time protecting the countryside and safeguarding the Borough's natural environment.
LA03/DPS/0023	Antrim Agri Fertilisers Ltd (One2One Planning Ltd)	Site Specific	Antrim Agri Fertiliser Ltd considers that Largy Road Industrial 'Area' should be considered as a Local Employment Site in Table 3 of Policy SP 2.7.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the LPP stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.

LA03/DPS/0024	Gareth Kelly	SP 1	Mr. Gareth Kelly considers the soundness tests have not been met with the planning process under sustainable development in reference to Page 62 (Policy SP 1) and Amplification text paras. 4.1; 4.2; 4.4; 4.6; 4.7; 4.8; and 4.9. He further considers that Pages 62-68 of the Plan have not been implemented.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Policy SP1 will be implemented through the Development Management process, the Local Policies Plan and supplementary guidance. No detail or evidence is provided in the representation to indicate why the provisions of Policy SP 1 Sustainable Development cannot be implemented.
LA03/DPS/0024	Gareth Kelly	SP 4	Mr. Gareth Kelly raises concerns regarding spreading housing allocation across the Borough on sporadic brownfield sites. Requests that the Commission should seek planning authorities to withdraw planning consents on dormant sites throughout the Borough and reallocate housing sites where there is existing infrastructure and employment. Indicates that a retirement village concept at Roughfort would fulfil this criteria by utilising existing infrastructure already in place as well as meeting the needs of the older generation.	Creation of a planned flagship project of mixed use development at Roughfort.	No change required. The Council considers that the policy as drafted and its approach to housing growth and housing allocation is appropriate and reasonable and has taken into account the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have this Policy". The Council will carry out an assessment of lands for housing at the Local Policies Plan Stage when it will consider zoning of land for housing. The evidence base for housing growth and allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0024	Gareth Kelly	SP 4	Mr. Gareth Kelly seeks clarification of how the Housing Growth Allocation was compiled.	No specified modification.	No change required. The Council considers the policy are drafted is appropriate and reasonable and has taken into consideration the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Paragraphs 7.6 to 7.15 of the Draft Plan Strategy, as well as Evidence Paper 2: Settlement Evaluation and Evidence Paper 6 identifies the approach undertaken by the Council regarding the allocation of housing growth. The Council has also published Topic Paper 1: Housing Growth. The Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of settlements and the estimated build rate within the open countryside were taken into consideration.
LA03/DPS/0024	Gareth Kelly	DM 17	Mr. Gareth Kelly considers that the soundness tests have not been met with respect to Policy DM 17.1 (a)-(g) and that the planning authority has not met its own strategic policies by building houses of similarity on development sites. The current concept that the planning authority has of building dissimilar houses in terms of value does not tick the coalescence box.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The aim of Policy DM 17.1, in conjunction with the design policies set out in Section 9 of the DPS, is to promote the development of high quality, attractive and sustainable homes within settlements.
LA03/DPS/0024	Gareth Kelly	Site Specific	Mr. Gareth Kelly: Subject lands are offered for a mixed used scheme, including a retirement village, country club and housing: Roughfort.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Polices Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0025	Mae Murray Foundation (One2One Planning)	SP 5	The Mae Murray Foundation welcomes the references in Policy SP 5.1 to the role of the community and voluntary sector in service provision.	No specified modification.	Support noted and welcomed.
LA03/DPS/0025	Mae Murray Foundation (One2One Planning)	DM 24	The Mae Murray Foundation considers the policy is inflexible to facilitate community needs that have to be delivered in rural areas. Considers the policy introduces a needs test of the local rural population. The policy does not include flexibility for community schemes that due to their nature or scale have to be delivered in the rural area but are not specific to the local rural population.	Suggested policy wording- "The Council will sympathetically view proposals for new community buildings and facilities, including outdoor recreational activities and play facilities at accessible locations in the countryside, where it has been demonstrated these are necessary to benefit the diverse needs of the residents of the Borough".	The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy", and Amplification text in paragraph 8.25. The Council considers that the assessment of proposals for community facilities in the countryside is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations
LA03/DPS/0026	McCausland Airport Garages Ltd (Donaldson Planning)	SP 3	McCausland Airport Garages Ltd suggests that a sequential test should apply in Policy 3.12 with land in or adjacent to the identified area of airport uses being given priority over lands more remote areas from Belfast International Airport.	Requests the inclusion of a sequential test in Policy SP 3.12.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers the provisions of Policy SP 3.12 provide for adequate control of airport related car parking at this time and that the preparation of the Local Policies Plan at the next stage of the LDP Process will provide the appropriate opportunity for all those will in an interest in this matter to put forward sites for consideration for additional airport parking or other airport related uses.

LA03/DPS/0026	McCausland Airport Garages Ltd (Donaldson Planning)	Site Specific	McCausland Airport Garages Ltd requests that the DPS provide an indication of the lands to be allocated for airport related uses and suggests that this should include their own car park site and land immediately to the north and east, as well as Airport owned lands.	Inclusion/zoning of land for development.	No change required. It is considered that due to the site-specific nature of this issue, it is a matter to be dealt with at the forthcoming Local Policies Plan stage of the LDP process, which will consider site specific designations and zonings relating to Belfast International Airport.
LA03/DPS/0026	McCausland Airport Garages Ltd (Donaldson Planning)	Site Specific	McCausland Airport Garages Ltd considers that the DPS does not clarify that McCausland Airport Garage and lands utilised for parking (both permanently and for 28 days per annum) are within existing Belfast International Airport operational boundary.	Requests that the lands currently in use by McCausland Airport Garages Ltd for airport related parking (including the 28 days lands) should be confirmed as within the operational boundary of Belfast International Airport.	No change required. Policy DM 13: Belfast International Airport - Operations states: "The Council will support development within the operational boundary of BIA where this is needed to maintain the current operational requirements of the airport or where it forms part of a scheme for the improvement to or an appropriate level of expansion of existing facilities". The Council's definition of 'operational land' is consistent with that defined on page 5 of The Planning (General Development) Order (Northern Ireland) 2015. As such, and consistent with the BIA operational boundary as defined in the extant Antrim Area Plan (1984-2001), the existing car park as referred cannot currently be considered as operational land of BIA. It is considered that due to the site-specific nature of this issue, it is a matter to be dealt with at the forthcoming Local Policies Plan stage of the LDP process, which will consider site specific designations and zonings.
LA03/DPS/0027	Kevin Logan (Donaldson Planning)	SP 1	Mr. Kevin Logan considers the DPD does not appear to have taken account of the neighbouring settlement of Greenisland, which abuts the eastern boundary of Antrim and Newtownabbey Borough.	No specified modification.	No change required. Only a very small part of the settlement of Greenisland lies within the Council boundary. The Council considers the need for additional growth in this settlement is a matter for the neighbouring Mid and East Antrim Borough Council. Should the need for additional growth be identified, the Council will work with the neighbouring authority to consider whether this would have potential implications for this Council area.
LA03/DPS/0027	Kevin Logan (Donaldson Planning)	Site Specific	Mr. Kevin Logan: Subject lands are offered for development: Greenisland	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land and in cross boundary consultation with Mid and East Antrim Council.
LA03/DPS/0028	Peter Cooke (Donaldson Planning Ltd)	SP 1	Mr. Peter Cooke considers the strategy is sound in so far as it relates to the Spatial Growth Strategy and objective SP 1.6(d), to sustain the role of villages as centres for opportunities for housing and employment.	No specified modification.	Support noted and welcomed.
LA03/DPS/0028	Peter Cooke (Donaldson Planning)	SP 4	The provision of 50 additional housing units to Burnside is welcomed by Mr. Peter Cooke (albeit this figure could be increased).	No specified modification.	Support noted and welcomed.
LA03/DPS/0028	Peter Cooke (Donaldson Planning)	SP 4	The promotion of affordable homes in rural locations such as Burnside is welcomed by Mr. Peter Cooke.	No specified modification.	Support noted and welcomed. The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.
LA03/DPS/0028	Peter Cooke (Donaldson Planning)	Site Specific	Mr. Peter Cooke requests subject lands be considered for housing development: Burnside. A significant proportion of which could be allocated for affordable housing.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land. The Council has now published Topic Paper 2 Affordable Housing which gives further clarifies its position on affordable housing. This document should be read for further information.

LA03/DPS/0029	Department of Justice	SP 6	<p>The DoJ welcomes the contribution that the draft Plan Strategy will make in creating and enhancing shared space, keeping communities safe and reducing crime.</p> <p>Welcomes that the 2016-2021 Programme for Government outcomes in relation to community safety, crime prevention and reduction has been taken into account.</p> <p>Requests that consideration be given to the inclusion and embedding of designing out crime in the principles and guidance which support the implementation of infrastructure projects, architecture and building environment issues.</p>	No specified modification.	<p>Support noted and welcomed.</p> <p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy".</p> <p>The Council considers that policy DM 25 (k) adequately addresses the issue of design to reduce the fear of crime and antisocial behaviour.</p> <p>Evidence Paper 21: Placemaking and Good Design sets out the evidence base in relation to the topic within the Borough and includes a summary of the 'Living Places Urban Stewardship and Design Guide', supplementary planning guidance. This guidance incorporates an understanding of how good design and successful places can meet the challenges of making places safe and as set out in Policy DM 25.2, all development proposals should demonstrate how they have taken this guidance into account.</p> <p>Designing out crime may also be a matter for inclusion within further Supplementary Planning Guidance to be prepared by the Council.</p>
LA03/DPS/0030	Central Management Branch, DfE	Setting the Context	The DfE welcomes the link to the draft PfG and draft NI Industrial Strategy, as local government will be an important partner in the delivery of these regional policy's overarching Outcomes. The Dept. has noted the specific links to the DfE-led outcomes.	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	SP 2	The DfE: The Council's approach to Innovation, Investment and Enterprise with a target of facilitating the growth of up to 9,000 new jobs over the next 10 years is noted.	No specified modification.	Noted.
LA03/DPS/0030	Central Management Branch, DfE	SP 2	<p>The DfE note that in Section 5 Employment of the DPS, Strategic Employment Locations are proposed for Metropolitan Newtownabbey, Antrim, Ballyclare, BIA and Nutts Corner.</p> <p>DfE considers Strategic Employment Locations are well placed to serve Northern Regional College's Newtownabbey and Ballymena campuses.</p> <p>The special significance of SEL's proposed at BIA and Nutts Corner are noted, in particular the development of transport and logistics which links with Higher Level Apprenticeships offered by NRC.</p>	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	SP 2	The DfE welcomes the Council's aim to promote sustainable tourism. The approach is complementary to the strategic drive in respect to tourism in NI and will form a key aspect to the Department's overarching NI Tourism Strategy.	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	SP 2	The DfE welcomes the Plan's recognition of the need to stimulate and grow the number of people choosing self-employment as an employment option. Welcomes the Council's efforts to improve productivity, investment in innovation, tackle economic inactivity and deprivation, and address skills gaps and inequalities across the Borough.	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	SP 3	<p>The DfE welcomes the approach to Policy SP 3 relating to upgrading road networks and connections with public transport such as park-and-ride facilities (creating integrated transport network).</p> <p>Concern is raised regarding ANBC residents ability to travel to NRC's campuses at Newtownabbey and Ballymena without the need for multiple transport nodes.</p>	No specified modification.	<p>Support noted and welcomed.</p> <p>The Council notes the issue raised regarding connectivity between campuses, whilst this is outside of the remit of the Plan, the Council will continue to engage with its statutory transport partners with regard to improvements to the local transportation network.</p> <p>The DPS's evidence base for transportation is set out in Evidence Paper 10: Transportation. This should be read for further information (Chapter 8 'How Residents Travel', pg. 30).</p>

LA03/DPS/0030	Central Management Branch, DfE	SP 3	The DfE welcomes the Council's approach to enhancing digital connectivity. DfE view the strategy as making a positive contribution to regional economic growth, increased entrepreneurial start-up activity and home working opportunities.	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	SP 9	DfE considers it would be useful if the Council could define what may constitute 'appropriate locations' for renewable energy technologies.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers appropriate locations for renewable energy technologies is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0030	Central Management Branch, DfE	SP 9	The DfE considers it would be useful if the Council could define what may constitute 'appropriate locations' for renewable energy technologies.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers appropriate locations for renewable energy technologies is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0030	Central Management Branch, DfE	SP 9	The DfE welcomes that 'The Council will seek to promote low carbon lifestyles which utilise renewable energy supplies...'. The DfE welcomes that the Council will support the development of a diverse range of renewable energy technologies.	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	DM 45	The DfE welcomes that the Council aims to facilitate the development of renewable energy generation. The DfE welcomes that the Council recognises that greater use of renewable energy will create more dependable energy mix, reducing dependence on fossil fuels. The DfE welcomes that the Council will support proposals that generate energy from a renewable source. The DfE welcomes that the Council request from applicants the detail around decommissioning of renewable infrastructure when it becomes redundant.	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	DM 45	The DfE considers that the assessment required under policy appears narrow in definition and is open to individual opinion. Suggests that more detail is required regarding what the impacts may be.	No specified modification.	The Council considers appropriate locations for renewable energy technologies is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0030	Central Management Branch, DfE	DM 45	The DfE points to the Plan's failure to recognise that wind turbines need to be placed where there is access to the best wind resource in order to be viable. Failure to take account of the fast changing pace of technology development in the sector and that larger, more efficient turbines may negate the need for high numbers of turbines in that area. Suggests that a line could be added to the policy that this will be taken into account.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council recognises there is a need to balance benefits associated with wind energy development against potential adverse effects. In bringing forward the Spatial Framework for wind energy it highlights that particular consideration and protection should be provided to certain areas, but importantly does not rule out wind energy proposals in these areas, rather it advises that proposal will generally only be appropriate in circumstances where any significant effects on the amenity and qualities of these areas can be substantially overcome by siting, design and other forms of mitigation.
LA03/DPS/0030	Central Management Branch, DfE	SP 10	The DfE supports the Council's Plan's policy approach to Waste Management, specifically the move away from landfill practices.	No specified modification.	Support noted and welcomed.

LA03/DPS/0030	Central Management Branch, DfE	SP 10	DfE considers it would be useful if the Council could define what may constitute 'appropriate locations' for renewable energy technologies.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers appropriate locations for renewable energy technologies is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0030	Central Management Branch, DfE	Evidence Paper 5: Tourism	Is reassured that the DPS current operational planning policy review found policy to be acceptable to current needs.	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	Evidence Paper 13: Renewables	The DfE welcomes the recognition that to underpin economic growth, the Borough needs a modern and sustainable economic infrastructure.	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	Evidence Paper 13: Renewables	The DfE welcomes the fact that solar technology, especially PV Technology, is on the rise across the Borough. The Department welcomes that the Council would actively encourage all large and small businesses to consider switching to renewable energy.	No specified modification.	Support noted and welcomed.
LA03/DPS/0030	Central Management Branch, DfE	Evidence Paper 13: Renewables	The DfE considers it would be useful if 'unacceptable' adverse impact can be more clearly defined, with examples provided. Considers it should be defined what are the unacceptable effects of wind and solar energy development that planning officers and consultees should consider in relation to BIA. The current map is four years old and there may not be as much capacity left in the region as the Council thinks. Has NIE Network's view been taken on this and the assentation that there is 'significant potential for grid connection of additional small-scale energy generation'? Latest official electricity consumption figure is 38.6% as at 31 March 2019. It should be noted throughout the document that it is on-shore wind energy that is the main source of producing renewable electricity in NI (to differentiate from off-shore wind). Update volume of electricity consumption to reflect latest data. EU Renewable Energy Directive has been replaced by RED II.	To update Evidence Paper to address inaccuracies, and updated evidence. Evidence Paper 13 should specify 'on-shore' wind energy throughout the document.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 9. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage. The Council has previously, and will continue to, engage with NIE Networks regarding LDP matters. The Council considers that the assessment of proposals for Natural Resources is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0031	John Greer (McGrandle Architect)	Site Specific	Mr. John Greer requests subject lands be considered for housing development: Tildarg.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.

LA03/DPS/0032	Historic Environment Division, DfC	DM 18 B	HED raises concern regarding Policy DM 18.8. Advises that this deviates from the SPPS in providing exceptional circumstances for a replacement dwelling where only a wall stead remains. Given the age of wall steads, they should be considered as unrecorded heritage assets and this policy has the potential to remove such assets and potential associated archaeological remains.	Request Policy DM 18.8 be deleted.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>All policies in the Plan should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Policy DM 18 should be read alongside Policies SP 4, SP 7 and DM 36.</p> <p>Policy DM 18.8 (b) 'Replacement Dwellings' clearly states, "It can be demonstrated that the wall stead are those of a previously occupied dwelling". Policy DM 36.1 (c) 'Vernacular and Locally Important Buildings' states, "The conversion involves minimal intervention".</p> <p>The Council considers these policies are consistent with para. 6.24 of the SPPS which states, "In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset".</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 18 B	For Policy DM 18.9 and supporting para. 7.51, HED considers the amplification text is unclear as to what evidence the Council requires to enable the determination of what are 'significant environmental benefits'.	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that the determination of significant environmental benefits is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 18 B	HED considers there is an opportunity to remove significant sections of this policy as it repeats the thrust of Policies DM 32 and DM 36 and has potential to cause significant confusion and misinterpretation.	<p>Suggested amendment:</p> <p>DM 18.14 – The Council will support proposals for the rehabilitation and reuse of vacant or derelict vernacular dwellings in the countryside and encouraged in preference to their replacement. Refer to the policy DM 36.</p> <p>DM 18.15 – Proposals involving the replacement of such dwellings will be assessed as follows:</p> <p>(a)...(As drafted in DPS document)</p> <p>(b)...(As drafted in DPS document)</p>	<p>No change required. Whilst the Council acknowledges there is some duplication with text in the Historic Environment section, it nevertheless considers the policy as draft is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy."</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 18 F	HED considers the reference to Listed Building(s) can be omitted as these are covered within the Historic Environment policy suite. Its inclusion here may lead to confusion.	<p>Policy 18.28 should be removed. Within Amplification text 7.52 HED suggested correction: In the case of a listed or non-listed vernacular dwelling, the Council will support their appropriate re-use and/or rehabilitation, rather than replacement. Refer to Historic Environment policy suite for further detail.</p>	<p>No change required. Whilst the Council acknowledges there is some duplication with text in the Historic Environment section, it nevertheless considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 29	HED considers paragraphs 6.14, 6.20 and 6.23 of the SPPS sets out a clear hierarchy approach with regard to the application of signage around heritage assets. Policy DM 29.2 does not fully acknowledge this hierarchy test, notably between Conservation Areas and Areas of Townscape Character. Potential to create confusion in the hierarchy approach to the protection of heritage assets.	<p>Proposed word changes to DM 29.2 -</p> <p><i>(a) an advertisement proposed to be attached to or within the curtilage of a listed building <u>must</u> be carefully designed and located to respect the special architectural or historic interest of the building;</i></p> <p><i>(b) advertisements in Conservation Areas <u>must not adversely affect</u> the special character, appearance and setting of the area;</i></p> <p><i>(c) advertisement in an Area of Townscape Character <u>must maintain the overall character and appearance of the area.</u></i> "</p>	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy"</p> <p>The Council does not consider the policy wording to be in conflict with the legislative position for heritage assets or the text of the SPPS.</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 30	HED considers the amplification text for Policy DM 30 makes no reference to Areas of Archaeological Potential which SPPS 6.29 refers. HED recognises that AAP's will be identified at LPP stage, however, mention of these at this stage would make the plan more sound and provide clarity to those reading the plan as to the meaning, purpose and the evaluative and mitigation policies that may apply.	<p>To achieve alignment with SPPS 6.29 insert the following additional paragraph of explanatory text after 10.16.</p> <p><u>"Areas of Archaeological Potential, identified in the Local Policies Plan highlight those areas within settlements where on the basis of current knowledge there is a likelihood that archaeological remains may be encountered during development."</u></p>	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that the matter is adequately addressed by the text relating to Areas of Archaeological Potential, set out in SP 7.2(e).</p> <p>The DPS's evidence base for the Historic Environment is set out in Evidence Paper 7: Historic Environment. This document should be read for further information (Chapter 9, Areas of Archaeological Potential, pg.20).</p>

LA03/DPS/0032	Historic Environment Division, DfC	DM 31	<p>HED considers Policy DM 31 is unsound due to inclusion of Policy DM 31.1(b) in that it fails to take sufficient account of SPPS and CE2 in that there is no evidence articulated that supports the direction taken with the addition of this item.</p> <p>Policy DM 31.1(b) introduces a lesser policy test whereby an exemption around circumstances where the adverse impacts, envisaged under item Policy DM 31.1 (a) and SPPS 6.16, would be permissible. There is no such provision in SPPS policy (6.16 & 6.17) therefore undermines the SPPS approach.</p> <p>HED states there is a clear contradiction between Policies DM 31.1(a) and DM 31.1(b) in that any development resulting in an adverse effect contrary to paragraph Policy DM 31.1(a) cannot by definition be satisfactory mitigated.</p> <p>HED also advise Policy DM 31.1 (b) conflicts with Council's policy test SP 9.2(c) in relation to Registered Historic Parks, Gardens and Demesnes where there is a presumption that development would only be permissible in cases where proposals are of regional importance in NL.</p>	Request Policy DM 31.1(b) to be removed.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council does not consider Policy DM 31.1(b) should be removed as it recognises the inherent balancing exercise required in the planning system. Where a decision is taken to permit development, based on strategic benefits to the Borough, that might result in certain adverse impacts on an Historic Park, it is considered both reasonable and necessary to seek appropriate mitigation measures.</p> <p>The Council does not consider there is a contradiction between DM 31.1 (b) and SP 9.2 (c). All the policies of the PDS must be read together. This is made clear in SP 1, the Positive Planning Note on page 11 and Para 1.5. As such for mineral development to be acceptable in an Historic Park there would need to be a regional need for the proposed mineral that would outweigh the importance of the site. s</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 32	HED welcomes the inclusion of 'Statement of Justification' to be submitted with applications which impact listed buildings on their settings. HED are drafting guidance to which they refer to 'Statement of Significance'. For consistency, HED request change from 'Statement of Justification' to 'Statement of Significance'.	Request change from 'Statement of Justification' to 'Statement of Significance'.	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy".</p> <p>The Council acknowledges that HED are currently preparing additional guidance which refers to 'Statement of Significance', but does not consider this will differ in any significant way from a 'Statement of Justification' set out in Policy DM 32.4, which should demonstrate a full and proper understanding of the essential character and special architectural or historical interest of a listed building and its setting.</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 32	HED have queried the location of text in para. 10.33 relating to, "In judging the effect of works to a Listed Building.." as whether it is appropriate at this point in the amplification text.	<p>HED consider the text in question should be moved from its current location to be standalone and amended to align with current legislation and regulations as follows.</p> <p><i>In judging the effect of works to a Listed Building, the Council will determine the application, after consultation with the relevant Department i.e. HED."</i></p>	<p>No change required.</p> <p>The Council considers the amplification text as drafted is appropriate and reasonable.</p> <p>Current consultation arrangements with statutory bodies are set out in relevant subsidiary legislation and may change over time. It is considered that the suggested modification is unnecessary and such consultation will occur as part of the normal Development Management process.</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 33	HED considers there is a slight difference in emphasis of DM 33.1 and DM 33.2 and is concerned that this will enable misinterpretation of and/or lack of clarity regarding the policy. HED considers DM 33.1 is not in alignment with SPPS 6.18 and is a weaker policy test than required under SPPS.	<p>Proposed word changes to DM 33.1 - <u>"The Council will only support development within or adjacent to a Conservation Area where the Guiding Principle is met and that is consistent with any relevant conservation area guidance"</u>.</p>	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council does not consider the policy wording to be in conflict with the legislative position for Conservation Areas or the text of the SPPS.</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 33	HED considers Policy DM 33.3 (a) is not in alignment with SPPS 6.18 and in conflict with Policy DM 33.2 in terms of wording order and the policy test regarding preserve and enhance. HED acknowledge that there is conflict in the wording order of preserve and enhance between 6.18 & 6.19 of the SPPS. Nevertheless, HED consider wording order is critical and consider the wording of the Plan policy should be consistent with SPPS 6.18.	<p>Request the following change to DM 33.3 (a) - <u>"The proposal must be in line with the Guiding Principle (DM 33.2) through the appropriate design, use of materials, detailing, scale, form & massing & arrangement of such development; &..."</u></p>	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Guiding Principle for development in a Conservation Area is made clear in Policy DM 33.2 and the Council does not consider the policy wording to be in conflict with the legislative position for Conservation Areas or the text of the SPPS.</p>
LA03/DPS/0032	Historic Environment Division, DfC	DM 33	<p>HED considers Policy DM 33.3(b) is not in alignment with SPPS 6.18 and in conflict with Policy DM 33.2 due to the use of the word 'maintained'. SPPS paragraphs 6.14, 6.20 and 6.23 set out a clear hierarchy policy approach around heritage assets; Listed Buildings, CAs and ATCs.</p> <p>The current policy does not acknowledge this hierarchy test, notably between CA and ATC, around the use of the words preserve and maintain. Under SPPS maintain is only used in the context of ATC within a historic environment context.</p>	Request the following changes to DM 33.3(b) - "The quality of views within, from & into the Conservation Area must be in line with the Guiding Principle (DM 33.2)."	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Guiding Principle for development in a Conservation Area is made clear in Policy DM 33.2 and the Council does not consider the policy wording to be in conflict with the legislative position for Conservation Areas or the text of the SPPS.</p>

LA03/DPS/0032	Historic Environment Division, DfC	DM 33	HED considers Policy DM 33.5 is not in alignment with SPPS 6.18 and in conflict with Policy DM 33.2 in terms of consistency and therefore, policy test weight regarding the wording order of 'preserve and enhance'.	Request the following change to DM 33.5 - "... <i>In such cases it must be clearly demonstrated that any redevelopment of the site <u>must be in line with the Guiding Principle (DM 33.2)</u>.</i> "	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Guiding Principle for development in a Conservation Area is made clear in Policy DM 33.2 and the Council does not consider the policy wording to be in conflict with the legislative position for Conservation Areas or the text of the SPPS.
LA03/DPS/0032	Historic Environment Division, DfC	DM 36	HED considers the policy and clarification text does not take sufficient account of SPPS 6.24. Fails to take account of the requirement to ensure no significance harm or loss is caused to the non-designated heritage asset. HED consider the use of the word maintain within DM 36.1(b) as a lesser policy test. HED is drafting guidance within which they refer to 'Significance' which will aid the decision making process in relation to this matter. The word 'renovation' has particular connotations in the field of conservation whereby renovation refers to making something look like new. HED consider that this potentially creates a higher policy test - not the aim of sound conservation principles.	Request the following change to DM 36.1. "The Council will support proposals for the sympathetic reuse & conversion of Proposals will be expected to meet all the following criteria: (a) As drafted in the DPS (b) The reuse or conversion causes no loss to the significance of or should enhance, the form, character & architectural features, design. . . (c) As drafted in the DPS". HED recommend the omission of the word 'renovation' from DM 36.1.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for this policy is provided in the text "Why we have this Policy". The Council does not consider the policy wording to be in conflict with the text of the SPPS.
LA03/DPS/0032	Historic Environment Division, DfC	DM 45	HED raises concerns around the wording of Policy DM 45.1, particularly 'avoid or address any unacceptable adverse impacts'. Considers this may weaken other policy protections in the DPS and that it articulates a weakening of the position set out in SPPS 6.224.	Request the following change to Policy DM 45.1. The words 'or address' should be removed.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The policy clearly indicates that renewable energy development should be compatible with policies to safeguard and enhance natural heritage and historic environment as well as not bringing forward any adverse impact on other relevant matters, such as public safety or residential amenity. All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and Para. 1.5. As such it is not considered that the policy weakens the protection afforded to the historic environment through Section 10 of the DPS. The Council notes that Policy SP 1.1 states, "When considering individual development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the Strategic Planning Policy Statement (SPPS)". SP 1.4 states,, "...the Council will require developers to provide impact assessments in association with planning applications where this is necessary to allow proper consideration of the impacts of the development and any mitigation measures proposed".
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED welcomes the considered use of historic environment evidence, which is demonstrated in Evidence Paper 2: Settlement Evaluation but raise a number of matters to be considered at the LLP stage of the Plan in relation to settlement limits and zonings.	No specified modification.	Support noted and welcomed. The Council notes that HED request certain matters be considered at the Local Policies Plan stage. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and will give consideration to these matters at the Local Policies Plan stage.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED welcome the recognition of the Borough's defence and maritime heritage. HED seek amendment to the last sentence of para 7.1 to include reference to 'Conservation Areas'.	Amendment to last sentence to read - "... <u>Local Landscape Policy Area, Conservation Area or Area of Townscape Character (ATC) designations</u> ".	Support noted and welcomed. The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 7. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED have recommended an amendment to the second bullet of Evidence Paper 7: Historic Environment para. 3.20.	Second bullet point of para 3.2 to read - "LDP should, <u>where appropriate</u> designate Areas of Significant Archaeological Interest ...".	Support noted and welcomed. The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 7. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED has recommended an amendment to Evidence Paper 7: Historic Environment para. 3.30 to include reference to architectural heritage.	Reference should be made to architectural as well as archaeological heritage.	Support noted and welcomed. The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 7. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED advise content could be made more robust when moving to LPP. HED have drafted several information paragraphs in relation to Marine and Maritime Heritage to potentially include at the LPP stage, which they consider helpful in demonstrating a more solid understanding of the evidence base.	Due to the extensive text please refer to original response for details.	The Council notes that HED request certain matters be considered at the Local Policies Plan stage. It is clear that when the Plan and all its evidence base is read together that there is sufficient evidence for the policies in the plan. In addition the Council has considered the importance The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and will give consideration to these matters at the Local Policies Plan stage.

LA03/DPS/0032	Historic Environment Division, DfC	SA	HED welcome Evidence Paper 21 and would welcome a clearer articulation of the importance of understanding historic context of a place toward informing positive place-making in the introduction of this paper.	No specified modification	Support noted and welcomed. The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality, this includes Evidence Paper 21: Placemaking and Good Design as well as the "Introduction" and "Why we have taken this approach" for Strategic Policy 6. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED highlight the wording of Policy DM 7.9, which does not make clear how 'the reuse or conversion of buildings will be encouraged', and does not seem as strong as the language in SPPS 6.279, which states, 'such retail facilities should be located within existing buildings...'	Amend policy wording of Policy DM 7.9 to wording of SPPS 6.279	The comments by HED in relation to the SA Report and the wording of Policy DM 7.9 is noted. The Council considers that Policy DM 7.9 as drafted as reasonable and appropriate. It is clear that reuse and conversion will be supported and this is a matter of semantics. No change required.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED have concern regarding the lack of hierarchy acknowledged between aspects of the historic environment as set out within SPPS.	No specified modification.	The comments by HED in relation the SA Report and wording to Policy DM 29 are noted. This is a DPS matter and is addressed on HED's DPS representation. <input type="checkbox"/>
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED consider the appraisal of Policy DM 31 to be flawed. Consider that the unsound policy results in a weakening of existing policy in PPS 6, BH 6, and a weakening of the policy articulated in SPPS 6.16 and 6.17. HED considers the impacts on the Historic Environment in relation to Policy DM 31.1b specifically are likely to be negative.	No specified modification.	The comments from HED in relation to the SA Report and scoring of DM 31 is noted. The comments regarding Policy DM 31 being unsound is a DPS matter and are addressed under HED's DPS representation. A final SA Statement will be published once the Plan is adopted which will should how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED have concern regarding the lack of hierarchy acknowledged between aspects of the historic environment, notably the language used within Policy DM 33 is not in alignment with the provision set out within SPPS 6.18.	No specified modification.	The comments in relation to the SA Report and Policy DM 33 are noted. Comments on Policy DM 33 are a DPS matter and are addressed under the response to HED's DPS Representation. A final SA Statement will be published once the Plan is adopted which will should how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED consider Policy DM 45 as worded has the potential for uncertain or possibly some negative effects with regard to the historic environment objective. HED refer to comments on policy approach and specifically wording of Policy DM 45.1.	No specified modification	The comments in relation to the SA Report and Policy DM 45 are noted. Comments on the policy wording of Policy DM 45 are a DPS matter and are addressed under the response to HED's DPS Representation. A final SA Statement will be published once the Plan is adopted which will should how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED would welcome the inclusion of Historic Environment Division in the List of Abbreviations (described as Glossary) at LPP stage.	Include Historic Environment Division in the List of Abbreviations (described as Glossary) at LPP stage.	Comments from HED on glossary of the SA Report are noted. In future versions of the report HED will be listed in the List of Abbreviations in the SA Report.
LA03/DPS/0032	Historic Environment Division, DfC	SA	Policy SP 1.13-1.17: HED would agree with the envisaged potential positive scoring outcomes in relation to the historic environment, but advise that these are dependent on the guidance referred to and how the policy is implemented.	No specified modification.	Comments from HED in relation to the SA Report and scoring for SP 1.13-1.17 are noted and welcomed. Appendix 4 of the SA Report sets out the reasoning for the policy scoring. A final SA Statement will be published once the Plan is adopted which will take into account responses received in relation to the consultation. In addition the SA and the LDP will be monitored.
LA03/DPS/0032	Historic Environment Division, DfC	SA	Policy DM 4: HED welcome the uncertain scoring here, and the explanation within the document. HED consider it important for the Council to acknowledge the scale of new agricultural shed development in a modern working farm as they have the potential to negatively affect both the historic landscape character, alongside heritage assets and their settings due to scale and potential landform alterations in their construction.	No specified modification.	Support from HED on the SA Report and scoring for DM 4 is noted and welcomed. The scoring text in the SA Report includes assessment of DPS Policy DM 4 Agricultural Development in relation to SO 14 which relates to the historic environment.

LA03/DPS/0032	Historic Environment Division, DfC	SA	Policies DM 6, DM 7 and DM 8: HED advise that whilst they can foresee potential positive outcomes for the historic environment, they consider that there is also potential for negative/uncertain impacts.	No specified modification.	The comments from HED in relation to the SA Report and scoring of Policies DM 6, DM 7 and DM 8 are noted. In relation to SO 14, these policies are scored as minor positive. Minor positive is where the policy/proposal would slightly help to achieve the objective. Appendix 4 of the SA sets out the reasoning for the policy scoring. The rescoring of the policy as requested does not impact on the policy as set out in the DPS. All policies of the plan should be read together and as such there are a number of other policies in the Plan in relation to historic environment which will be a consideration in the determining of planning applications. A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0032	Historic Environment Division, DfC	SA	HED overall, agree with the uncertain scoring for Policies DM 18 and DM 18 B but advise that there is potential for Policy DM 18 B to have significant negative impacts with regard to the historic environment, as wall steads which represent the remains of buildings shown on the first edition ordnance survey maps, could be of significant age and may have associated archaeological remains.	No specified modification.	The comments from HED in relation to the SA Report and scoring of Policy DM 18 B are noted. Appendix 4 of the SA sets out the reasoning for the policy scoring. The rescoring of the policy as requested does not impact on the policy as set out in the DPS. All policies of the Plan should be read together and as such there are a number of other policies in the Plan in relation to historic environment which will be a consideration in the determining of planning applications. A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0032	Historic Environment Division, DfC	SA	Policy DM 18: HED would question whether the scoring of Sustainability Objective 12 as 'neutral / no effect', accurately reflects the potential of housing in the wider countryside to negatively impact natural heritage and whether an 'uncertain' score may be more accurate.	No specified modification.	The comments from HED in relation to the SA Report and scoring of Policy DM 18 are noted. Appendix 4 of the SA sets out the reasoning for the policy scoring. The rescoring of the policy as requested does not impact on the policy as set out in the DPS. All policies of the Plan should be read together and as such there are a number of other policies in the Plan in relation to historic environment which will be a consideration in the determining of planning applications. A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0032	Historic Environment Division, DfC	SA	Policy DM 29: HED, overall, agree with the significant positive scoring afforded for policies that aim to respect the character where these are proposed.	No specified modification.	Support from HED on the SA Report and scoring for Policy DM 29 noted and welcomed.
LA03/DPS/0032	Historic Environment Division, DfC	SA	Policy DM 33: HED agrees with the significant positive scoring afforded for policies that aim to respect the character for where these are proposed .	No specified modification.	Support from HED in relation to the SA Report and scoring of Policy DM 33 is noted and welcomed.
LA03/DPS/0032	Historic Environment Division, DfC	SA	Policies DM 37, DM 38, DM 39, and DM 42: HED consider that, given the intertwined relationship between the historic environment, the natural environment and landscape, it is likely that, on the whole, these policies will deliver positive outcomes in relation to the historic environment objective.	No specified modification.	Support from HED in relation to the SA Report and scoring for Policies DM 37, DM 38, DM 39 and DM 42 is noted and welcomed.
LA03/DPS/0032	Historic Environment Division, DfC	SA	Policy DM 41: HED consider this policy will have minor positive outcomes with regard to the historic environment objective. The intertidal and coastal area contains a large number of heritage assets, both recorded and unrecorded.	No specified modification.	The comments from HED in relation to the SA Report and scoring of Policy DM 41 are noted. Appendix 4 of the SA sets out the reasoning for the policy scoring. The rescoring of the policy as requested does not impact on the policy as set out in the DPS. An overall negligible score was awarded due to the limited scope and extent of potential coastal development in the Council area. All policies of the Plan should be read together and as such there are a number of other policies in the Plan in relation to historic environment which will be a consideration in the determining of planning applications. A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0032	Historic Environment Division, DfC	SA	Policy DM 44: HED advise that with regard to the text in relation to this assessment, the excavation of archaeological remains is in itself a destructive process, albeit one which is carried out scientifically. Although artefacts and records may result, the archaeological site itself will be wholly or partially destroyed and this should be considered in the text and scoring.	No specified modification.	The comments from HED in relation to the SA Report and scoring of Policy DM 44 are noted. Appendix 4 of the SA sets out the reasoning for the policy scoring. The rescoring of the policy as requested does not impact on the policy as set out in the DPS. All policies of the Plan should be read together and as such there are a number of other policies in the Plan in relation to historic environment which will be a consideration in the determining of planning applications. A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0032	Historic Environment Division, DfC	Scoping	HED consider this to be a comprehensive scoping report with clear cognisance taken of their previous comments in updating it.	No specified modification.	Support from HED on the SA Scoping Report is noted and welcomed. No impact on DPS or SA Report.

LA03/DPS/0032	Historic Environment Division, DfC	Scoping	Para.5.7.4: Key Sustainability Issues for Physical Resources. HED would welcome consideration of protected heritage assets (i.e. scheduled monuments) as an issue in relation to quarrying.	Consideration of protected heritage assets (i.e. scheduled monuments) as an issue in relation to quarrying.	The comments from HED in relation to the SA Scoping Report are noted and welcomed. Amendments will be considered in future versions of the Scoping Report. No impact on DPS or SA Report.
LA03/DPS/0032	Historic Environment Division, DfC	Scoping	Para.5.10.4: Key Sustainability Issues for Climate Change. HED advise that the relationship of the historic environment with climate change should be articulated	Suggested wording 'The inherent sustainability of using historic and existing buildings (over new build) should be recognised for its positive impact, both on needs for raw materials and energy expended in producing new buildings.'	The comments from HED in relation to the SA Scoping Report are noted and welcomed. Amendments will be considered in future versions of the Scoping Report. No impact on DPS or SA Report.
LA03/DPS/0032	Historic Environment Division, DfC	Scoping	Para. 5.14.1: Review of Policies, Plans, Programmes and Strategies. HED suggest amended wording.	Suggested wording at 5th line of text to include, 'these conventions place responsibilities on member states to consider the conservation of archaeological and architectural cultural heritage resources.'	The comments from HED in relation to the SA Scoping Report are noted and welcomed. Amendments will be considered in future versions of the Scoping Report. No impact on DPS or SA Report.
LA03/DPS/0032	Historic Environment Division, DfC	Scoping	HED advise that the Department for Communities (HED) are the Current Lead responsible for the implementation of the Historic Monuments and Archaeological Objects (NI) Order 1995. The table on page 176 should be corrected moving forward to the LPP stage.	no specified modification.	The comments from HED in relation to the SA Scoping Report are noted and welcomed. Amendments will be considered in future versions of the Scoping Report. No impact on DPS or SA Report.
LA03/DPS/0032	Historic Environment Division, DfC	Scoping	HED advise that Areas of Architectural Potential must be amended to read 'Areas of Archaeological Potential'.	Replace word "architectural" with "archaeological" to read "Areas of Archaeological Potential".	The comments from HED in relation to the SA Scoping Report are noted and welcomed. Amendments will be considered in future versions of the Scoping Report. No impact on DPS or SA Report.
LA03/DPS/0033	Brian McBride (Gravis Planning)	Plan Vision	Mr. McBride supports the Plan Vision as it shows the positive position the Council area should take come 2030 and reflects the Council aspirations for the area.	No specified modification.	Support noted and welcomed.
LA03/DPS/0033	Brian McBride (Gravis Planning)	Strategic Objectives	Mr. McBride is generally supportive of Strategic Objectives 1 - 14.	No specified modification.	Support noted and welcomed.
LA03/DPS/0033	Brian McBride (Gravis Planning)	SP 1	Mr. McBride is generally supportive of the Spatial Growth Strategy approach, specifically criterion (d) which aims to sustain and maintain the role of villages, such as Doagh as centres for housing and employment of an appropriate scale and character.	No specified modification.	Support noted and welcomed.
LA03/DPS/0033	Brian McBride (Gravis Planning)	SP 2	Mr. McBride considers that the number of new jobs to be created over the plan period should be increased. Considers that the creation of 9,000 new jobs has been calculated based on housing growth and would therefore not sustain the suggested higher housing growth figure.	Revise job creation figure upwards to around 10,000 jobs in line with the suggested revised housing growth figure.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". As indicated in para. 5.8 the potential growth of up to 9,000 jobs across the Borough is derived from the Council's published Economic Strategy.

LA03/DPS/0033	Brian McBride (Gravis Planning)	SP 4	Mr. McBride considers the Council's housing growth figure underestimates housing need and is not reasonably flexible to enable it to deal with changing circumstances, i.e. unexpected growth and is not based on a robust evidence base. Considers the amount of housing growth for the Borough should be predicated on Option 3 as set out in the Council POP which will provide greater flexibility and better reflect the ambitious economic growth plan of neighbouring Belfast City Council. Following their own analysis suggests a revised housing growth figure of 11,220 units (or 14,960 units including a 5 year additional housing supply).	Revise housing growth figure to 11,220 units.	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>The LDP process affords greater flexibility in the planning process by incorporating provisions for 5 years reviews and this will enable the Council to adapt the Plan in response to changing needs in circumstances, both regionally and locally. The Council is required to prepare an Annual Monitoring Report that will help inform whether change is required. Accordingly if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.</p> <p>Whilst reliance for an uplift in the Borough's housing growth figure in this representation is made on the need for the Plan to accommodate the economic growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.</p>
LA03/DPS/0033	Brian McBride (Gravis Planning)	SP 4	Mr. McBride considers the Housing Growth Allocation should be amended to focus on growing towns and selected villages per the Council preferred option in its POP and in light of the proposed increase to the Housing Growth Figure for the Borough, the allocation for Doagh should be increased to 171 units (or 230 units including a 5 year additional housing supply).	Redistribute increased level of growth in line with suggested table. Increase Housing Growth Allocation to Doagh to 171 units or 230 units.	<p>No change required. It is considered that the 75 unit housing allocation proposed for Doagh is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Doagh. It is considered that an increase in the overall housing allocation to Doagh would be at odds with the considerations identified above.</p> <p>The DPS's evidence base for the housing allocation to Doagh is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read together.</p>
LA03/DPS/0033	Brian McBride (Gravis Planning)	DM 17	Mr. McBride objects to inclusion of the Lifetimes Homes requirement with Policy DM 17.1 (d). Although supportive of Lifetime Homes approach, it should be brought forward through the Building Regulations rather than planning requirements, as in England. The requirement poses another design challenge which may not be achievable on all sites, specifically those constrained in terms of size.	Delete Policy DM 17.1(d).	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers the inclusion of Lifetime Homes as part of the planning design requirements is not unacceptably onerous and the requirement for a proportion of new homes to be designed to Lifetime Homes standards will assist in the creation of a welcoming and accessible environment and encourage the creation of more balanced communities.</p>
LA03/DPS/0033	Brian McBride (Gravis Planning)	DM 17	Mr. McBride objects to the threshold identified for Affordable Housing of 40 units which should be increased to 50 units to align with 'major' residential development proposals. Also proposals should only be required to deliver affordable housing units where there is an established need identified within the settlement or locality.	Revise the threshold in Policy DM 17.3 to 50 units and only require affordable housing units where there is an identified need in a settlement or locality.	<p>No change required. It is considered that the policy is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>In order to provide certainty for all parties, the policy should be applied consistently, with the expectation that all proposals of 40 units or greater will be required to deliver affordable units.</p> <p>It is recognised from the NIHE Housing Needs Assessment that there is an affordable housing need across the entire Borough. If Policy DM 17.3 was only to be applied to those settlements or geographical locations where a need has been identified, this could significantly undermine the potential of the policy to meet the overall needs of the Borough.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>
LA03/DPS/0033	Brian McBride (Gravis Planning)	Site Specific	A review of three undeveloped zoned residential sites states that only DH 04/01 (BMAP zoning) is available to sustain growth over the plan period. Objection calls in question the availability of DH 04/01, given lack of previous or recent planning history. Alternative suitable lands that can be more readily developed should be considered by the Council to deliver a sufficient supply of housing over the plan period.	No specified modification.	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Homes and updated within Topic Paper 1: Housing Growth.</p> <p>A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0033	Brian McBride (Gravis Planning)	Site Specific	Mr. McBride requests subject lands be considered for housing development: Doagh	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0033	Brian McBride (Gravis Planning)	Monitoring	Mr. McBride suggests amending the indicator to 10,000 jobs (to reflect request for an uplift in the number of homes - 11,220).	IMF - SP 2 - uplift from 9,000 jobs to 10,000 jobs	No change required. As the Council has already indicated no change to the jobs figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.
LA03/DPS/0033	Brian McBride (Gravis Planning)	Monitoring	Mr. McBride suggests amending the indicator to 11,220 homes.	IMF - SP 4 - uplift from 9,750 homes to 11,220 homes	No change required. As the Council has already indicated no change to the housing growth figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.

LA03/DPS/0034	Minerals Products Association (NI) Ltd	SP 9	MPANI is content with Policies SP 9.1, 9.2 and 9.3.	No specified modification.	Support noted and welcomed.
LA03/DPS/0034	Minerals Products Association (NI) Ltd	SP 9	MPANI considers that the DPS fails to recognise the significant contribution the Borough's mineral sector makes to the Council's rates income.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". It is clear when the Plan and all its evidence base is read as a whole that the Council recognises the economic importance of the minerals industry.
LA03/DPS/0034	Minerals Products Association (NI) Ltd	DM 43	MPANI is content with Policy DM 43 and would commend the Council for the common sense approach in Policy DM 43.6.	No specified modification.	Support noted and welcomed.
LA03/DPS/0034	Minerals Products Association (NI) Ltd	DM 44	MPANI welcomes Policy DM 44.	No specified modification.	Support noted and welcomed.
LA03/DPS/0034	Minerals Products Association (NI) Ltd	DM 44	MPANI advise the Council that Policy DM 44.2 should be rigorously adhered to.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the SPPS. The Council considers that the assessment of proposals under this policy is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0034	Minerals Products Association (NI) Ltd	Evidence Paper 12: Minerals	MPANI commend the Council on producing an excellent evidence paper on minerals. They also commend the Council for actively engaging with MPANI and the Industry in the Council Area.	No specified modification.	Support noted and welcomed.
LA03/DPS/0034	Minerals Products Association (NI) Ltd	Evidence Paper 12: Minerals	MPANI welcomes the Council's acknowledgment of the significant contribution that the minerals industry makes to the Borough and beyond.	No specified modification.	Support noted and welcomed.
LA03/DPS/0034	Minerals Products Association (NI) Ltd	Draft Plan Strategy	Having considered the DPS in detail, MPANI are of the view that it meets all of the consistency and soundness tests set out in the SPPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0035	Ulster University (Gravis Planning)	Plan Vision	Ulster University supports the Plan Vision as it shows the positive position the Council area should take, come 2030 and reflects the Council aspirations for the area.	No specified modification.	Support noted and welcomed.

LA03/DPS/0035	Ulster University (Gravis Planning)	Strategic Objectives	Ulster University are generally supportive of Strategic Objectives 1 - 14.	No specified modification.	Support noted and welcomed.
LA03/DPS/0035	Ulster University (Gravis Planning)	SP 1	Ulster University are generally supportive of the Spatial Growth Strategy, specifically criterion (a) which aims to focus core growth on Metropolitan Newtownabbey and the Major Hub Town of Antrim, based on existing committed development allocations and strengthen their role as the primary locations for future housing and economic growth and investment within the Borough.	No specified modification	Support noted and welcomed.
LA03/DPS/0035	Ulster University (Gravis Planning)	SP 2	Ulster University considers that the number of new jobs to be created over the plan period should be increased. Considers that the creation of 9,000 new jobs has been calculated based on housing growth and would therefore not sustain the suggested higher housing growth figure.	Revise job creation figure upwards to around 10,000 jobs in line with the suggested revised housing growth figure.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". As indicated in para. 5.8 the potential growth of up to 9,000 jobs across the Borough is derived from the Council's published Economic Strategy.
LA03/DPS/0035	Ulster University (Gravis Planning)	SP 4	Ulster University considers the Council's housing growth figure underestimates housing need and is not reasonably flexible to enable it to deal with changing circumstances, i.e. unexpected growth and is not based on a robust evidence base. Considers the amount of housing growth for the Borough should be predicated on Option 3 as set out in the Council POP which will provide greater flexibility and better reflect the ambitious economic growth plan of neighbouring Belfast City Council. Following their own analysis suggests a revised housing growth figure of 11,220 units (or 14,960 units including a 5 year additional housing supply).	Revise housing growth figure to 11,220 units.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. The LDP process affords greater flexibility in the planning process by incorporating provisions for 5 years reviews and this will enable the Council to adapt the Plan in response to changing needs in circumstances, both regionally and locally. The Council is required to prepare an Annual Monitoring Report that will help inform whether change is required. Accordingly if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter. Whilst reliance for an uplift in the Borough's housing growth figure in this representation is made on the need for the Plan to accommodate the economic growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.
LA03/DPS/0035	Ulster University (Gravis Planning)	DM 17	Ulster University object to the inclusion of the Lifetimes Homes requirement within Policy DM 17.1 (d). Although supportive of Lifetime Homes approach, it should be brought forward through the Building Regulations rather than planning requirements, as in England. The requirement poses another design challenge which may not be achievable on all sites, specifically those constrained in terms of size.	Delete Policy DM 17.1(d).	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the inclusion of Lifetime Homes as part of the planning design requirements is not unacceptably onerous and the requirement for a proportion of new homes to be designed to Lifetime Homes standards will assist in the creation of a welcoming and accessible environment and encourage the creation of more balanced communities.
LA03/DPS/0035	Ulster University (Gravis Planning)	DM 17	Ulster University indicate broad support for the inclusion of criteria within Policy DM 17 relating to neighbourhood facilities. Ulster University makes the case that the Jordanstown area of the University campus site would be suitable for a 'neighbourhood centre' allocation based on a perceived lack of local service or retailing provision.	Consider adding a new 'neighbourhood centre' for the Jordanstown area on the campus site.	Support noted and welcomed. Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0035	Ulster University (Gravis Planning)	DM 17	Ulster University object to the threshold identified for Affordable Housing of 40 units which should be increased to 50 units to align with 'major' residential development proposals. Also proposals should only be required to deliver affordable housing units where there is an established need identified within the settlement or locality.	Revise the threshold in Policy DM 17.3 to 50 units and only require affordable housing units where there is an identified need in a settlement or locality.	No change required. It is considered that the policy is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". In order to provide certainty for all parties, the policy should be applied consistently, with the expectation that all proposals of 40 units or greater will be required to deliver affordable units. It is recognised from the NIHE Housing Needs Assessment that there is an affordable housing need across the entire Borough. If Policy DM 17.3 was only to be applied to those settlements or geographical locations where a need has been identified, this could significantly undermine the potential of the policy to meet the overall needs of the Borough. The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.
LA03/DPS/0035	Ulster University (Gravis Planning)	DM 23	Ulster University consider the Open Space designation and associated policy for its protection, should not be applied to open space areas at Ulster University Jordanstown, as it could hinder the redevelopment of the Ulster University Masterplan area.	The Council should not retain or extend open space zonings on the Jordanstown campus site, based on comment made by the Commissioner when determining the planning appeal in relation to the previous masterplan application.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land. The Council considers the redevelopment of the Ulster University's Jordanstown campus is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.

LA03/DPS/0035	Ulster University (Gravis Planning)	Monitoring	Ulster University suggest amending the indicator to 10,000 jobs (to reflect request for an uplift in the number of homes - 11, 220)	IMF - SP 2 - uplift from 9,000 jobs to 10,000 jobs	No change required. As the Council has already indicated no change to the jobs figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.
LA03/DPS/0035	Ulster University (Gravis Planning)	Monitoring	Ulster University suggest amending the indicator to 11,220 homes.	IMF - SP 4 - uplift from 9,750 homes to 11,220 homes	No change required. As the Council has already indicated no change to the housing growth figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.
LA03/DPS/0035	Ulster University (Gravis Planning)	Site Specific	Ulster University considers a residential led masterplan for redevelopment of Jordanstown Campus site could help contribute to housing growth in Metropolitan Newtownabbey and in meeting the needs of the district.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0035	Ulster University (Gravis Planning)	Site Specific	<p>Ulster University suggests the Council consider redrawing LLPA designation MNY46 (BMAP designation) to cover only the stream corridors that run through the campus, rather than applying the designation to the entire campus lands.</p> <p>Also, for the Council to consider the comments made by the Commissioner when determining the previous appeal on the masterplan application on the Ulster University Jordanstown complex.</p>	Consider redrawing this LLPA designation on the foot of the comments made by the Commissioner when determining the planning appeal in relation to the previous masterplan application.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0036	Antrim and District Angling Association	Plan Vision	ADAA indicates it is not too sure what the term "continue to be" means. If the Council is suggesting in the DPS that the Borough's built and natural environment are currently of high quality and well looked after, ADAA would therefore strongly disagree with this part of the Vision.	Suggests that at line 7, the words 'continue to be', be removed.	<p>No change required. The Council considers the Draft Plan Strategy Vision as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. Section 3 of the DPS sets out the context in which the vision was prepared including the Council's Corporate plan, Community Plan and key priorities for the Borough.</p> <p>Paragraph 1.6 of the DPS clearly states, "The LDP is intended to provide a plan framework that will support the economic and social needs of our Borough up to 2030".</p>
LA03/DPS/0036	Antrim and District Angling Association	Strategic Objectives	ADAA consider the Visionary Objectives as 'workman like' and lacking in real vision. ADAA consider this is a missed opportunity for the Council.	No specified modification.	No change required. The Council considers the DPS strategic objectives as drafted is appropriate and reasonable and have taken account of the provisions of the RDS and SPPS. Section 3 of the DPS sets out the context in which objectives were prepared.
LA03/DPS/0036	Antrim and District Angling Association	Strategic Objectives	Strategic Objective 4 is strongly supported by ADAA. Strategic Objective 4 is a positive objective as long as 'sustainable' focuses on environmental sustainability. Strategic Objective 6 is welcomed by ADAA. Strategic Objective 7, 8 and 10 is strongly supported by ADAA.	No specified modification.	Support noted and welcomed.
LA03/DPS/0036	Antrim and District Angling Association	Strategic Objectives	Whilst ADAA is supportive of Strategic Objective 11, they consider rivers and streams have been excluded. ADAA consider the wording used gives the impression that biodiversity does not exist in built up areas.	No specified modification.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor punctuation change in response to the representation for the purposes of clarification to emphasise the importance of biodiversity in the plan. The reference to biodiversity in Strategic Objective 11 is not intended to solely relate to open countryside and therefore the comma suggested will ensure clarification.</p> <p>The minor punctuation change does not introduce any new policy concept to the DPS. It is clear when the plan and its evidence base is read in totality that the Council has considered the role of biodiversity (e.g. SP1, SP6, SP8 etc.). The concept is already introduced in a range of legislation e.g. Wildlife and Natural Environment Act (Northern Ireland) 2011, The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) etc. as well as regional policy such as the RDS 2035 and SPPS.</p> <p>Suggested minor change at Strategic Objective 11, page 59, Insertion of comma after biodiversity to read "biodiversity, and conserve."</p>
LA03/DPS/0036	Antrim and District Angling Association	Strategic Objectives	ADAA considers that Strategic Objective 12 must include a specific reference to trees.	Wording should include trees.	No change required. The Council considers the objective as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. Section 3 of the DPS sets out the context in which objectives were prepared. Reference to 'Natural Resources' includes trees. Trees are a component of our natural resources.

LA03/DPS/0036	Antrim and District Angling Association	Strategic Objectives	ADAA consider that Strategic Objective 13 should be positive as well as negative.	Include wilding opportunities and timber production.	No change required. The Council considers the objective as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. Section 3 of the DPS sets out the context in which objectives were prepared. The Council does not see merit in including a negative objective.
LA03/DPS/0036	Antrim and District Angling Association	Strategic Objectives	ADAA requests Strategic Objective 14 to include upcycling.	Include upcycling.	No change required. The Council considers the objective as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. Section 3 of the DPS sets out the context in which objectives were prepared.
LA03/DPS/0036	Antrim and District Angling Association	SP 1	ADAA consider that the policy wording needs to be clarified and policy strengthened to protect and enhance the river environment.	SP 1.13 should read 'Developers will provide'.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS . The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council notes that if/ when introduced, development contributions can only be used for mechanisms within the Council's control. Paragraph 1.17 clearly demonstrates the Council's commitment to bring forward supplementary planning guidance as the Local Development Plan progresses.
LA03/DPS/0036	Antrim and District Angling Association	SP 2	ADAA supports the protection and development of town centres, rather than out-of-centre development, which is often located on valuable land.	No specified modification.	Support noted and welcomed.
LA03/DPS/0036	Antrim and District Angling Association	SP 2	ADAA consider there are many opportunities for sustainable tourism along the Six Mile Valley. Lough Neagh is an outstanding opportunity, with the Council's new visitor centre being an important addition.	No specified modification.	Noted.
LA03/DPS/0036	Antrim and District Angling Association	DM 4	ADAA are very disappointed that this part of the Plan is dealt with in such a cursory manner. ADAA consider it is unacceptable that farm buildings are erected with the minimum regard to appearance. Planners also need to put into place a requirement to protect the agricultural landscape especially the protection of river, streams , ditches, hedges, trees and woodlands.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that the majority of farm buildings are erected through the Permitted Development legislative process rather than through the normal Development Management process. Those buildings erected outside of the permitted development process will be subject to the policies contained within the DPS which should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.
LA03/DPS/0036	Antrim and District Angling Association	DM 4	ADAA considers unsustainable agricultural activities impact upon water quality and the environment.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Policy wording relates to agricultural 'development' rather than 'activities' which the Council considers are outwith the role of the LDP process.
LA03/DPS/0036	Antrim and District Angling Association	SP 3	ADAA are supportive of means of transport that minimise damage to the environment and therefore keen to see priority given to walking and cycling. However, to make these modes of transportation effective there must be better connectivity and advance planning. ADAA are encouraged the Plan considers the reuse of former railway lines.	No specified modification.	Support noted and welcomed.
LA03/DPS/0036	Antrim and District Angling Association	DM 12	ADAA considers Policy DM 12 as helpful, whilst noting the lack of basic footpaths and cycle routes across the Borough and in the particular, within Doagh village.	No specified modification.	Support noted and welcomed.

LA03/DPS/0036	Antrim and District Angling Association	DM 15	<p>Mains sewage is strongly supported by ADAA, who consider it is important that there is adequate and high quality infrastructure in place. Unacceptable that there are still overflows of sewage into rivers and the sea.</p> <p>Separation measures must be part and parcel of all developments and infrastructure brought up to the necessary standard to ensure a holistic approach to preventing sewage entering rivers, streams, loughs and sea.</p> <p>Concerns raised regarding under investment in waste water treatment plants and consider it is important for the Plan to state that development cannot take place where waste treatment plants cannot cope.</p>	No specified modification.	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council will continue to engage with its statutory partners with regard to WwTW capacity issues.</p> <p>Development and WwTW capacity issues will be considered through the normal Development Management process.</p>
LA03/DPS/0036	Antrim and District Angling Association	DM 17	<p>Whilst ADAA welcomes the provision of open space standards for homes, they consider there is a current under provision across the Borough.</p> <p>Consider it is critical that open space integrates to form wildlife corridors and is part of connectivity arrangements with appropriate links to transportation and waterways etc. Links to rivers and streams need to be put in place and open ditches allowed to remain rather than be piped.</p>	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council advises that planning policy contained within the DPS must be read in its entirety. All policies within the LDP should be read together. This is made clear in Policy SP1, Positive Planning Note on page 11 and para 1.5.</p>
LA03/DPS/0036	Antrim and District Angling Association	DM 23	<p>Whilst ADAA are supportive of Policy DM 23, it not supportive of the possible justifications for development. ADAA requests the policy includes a reference to trees and woodlands and their importance in terms of climate change, improving the environment and public health.</p>	<p>Whilst no specific modification is indicated, include reference to trees and woodlands and their importance in terms of climate change and their help in improving the environment and people's health.</p>	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>In addition, it should be noted that the DPS includes policy provision for responding to climate change in Policy SP 10 Environmental Resilience and Protection, and trees and development in Policy SP 8 Natural Heritage, in particular Policy DM 42 Trees and Woodland.</p>
LA03/DPS/0036	Antrim and District Angling Association	SP 6	ADAA state that the objectives of SP 6 are excellent.	No specified modification.	Support noted and welcomed.
LA03/DPS/0036	Antrim and District Angling Association	SP 6	ADAA make a general comment regarding design considerations relating to historic planning decisions in the Borough and its impact on the wider environment.	No specified modification.	Noted. The Council considers this issue relates to historical planning decisions in the Borough and is therefore outwith the DPS process.
LA03/DPS/0036	Antrim and District Angling Association	DM 25	ADAA are very supportive of Policy DM 25 and feel very strongly that rivers provide one of the most important places for movement and connectivity.	No specific modification, however ADAA request for river corridors to be considered in terms of movement and connectivity.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".
LA03/DPS/0036	Antrim and District Angling Association	DM 26	<p>ADAA consider shop fronts is one area that the Council's vision, which is tied closely to nature, does not express well. ADAA recognises the plethora of plastic signage in the Borough.</p> <p>ADAA would ask that the Council take planning measures to reduce the use of plastics for this purpose.</p>	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>Policy DM 29(c) advises that an advertisement should be sympathetic to its location in terms of the style of sign and finishes to be used. This is a matter that falls for determination under the normal Development Management process.</p>
LA03/DPS/0036	Antrim and District Angling Association	SP 7	ADAA is supportive of the objectives and policies for the Historic Environment.	No specified modification.	Support noted and welcomed.

LA03/DPS/0036	Antrim and District Angling Association	SP 7	ADAA considers the DPS does not highlight the combination of the built and natural environment of the Six Mile valley. Every effort should be made to protect the remains of the Six Mile valley industrial heritage and enable its restoration. Considers the Six Mile valley has potential to become an outstanding area for inhabitants and visitors.	No specified modification.	No change required. The Council considers that the policy as a drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers that the current policies as set out in the Historic Environment and Natural Heritage sections of the DPS will effectively protect those elements of the Six Mile Water Valley identified in the representation.
LA03/DPS/0036	Antrim and District Angling Association	SP 8	ADAA is supportive of Policy SP 8 Natural Heritage. However, the Association considers that various proposals are not sufficiently objective and there is little expression of making improvements and enhancing protection of natural assets. The Association considers it odd that there is no mention of the aquatic environment and is disappointed that the Six Mile Water Valley and rivers such as the Maine and Crumlin river do not receive any mention which is a major omission.	No specific modification but requests that the Six Mile Valley, the natural and historic environment be considered as a single entity.	No change required. The Council considers the policy as drafted is appropriate and reasonable. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers aquatic environments includes inland surface waters, seas and ground water. Fig 12 on page 240 of the DPS clearly sets out the Natural Heritage Assets within the Borough, to include Large Rivers, the Coastal Area, and Belfast Lough, Lough Neagh and Lough Beg. In addition, paragraph 11.9 (page 239) of the DPS sign posts the reader to aquatic environments as defined by DAERA on their website. The Council considers that there is no need for the cross-referencing suggested, as all policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.
LA03/DPS/0036	Antrim and District Angling Association	SP 8	ADAA considers that as a minimum, the Six Mile Valley must be made a Strategic Landscape Policy Area.	No specified modification.	No change required. The Council considers the list of Strategic Landscape Policy Areas as identified on page 237 of the DPS, are appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Evidence Papers 16, 17, 18, 19 and 20 set out information in relation to the Natural Heritage assets across the Borough and the rationale for the identification of the Strategic Landscape Policy Areas included within the DPS. In addition there are a range of policies in the plan to support the natural environment.
LA03/DPS/0036	Antrim and District Angling Association	SP 8	Whilst ADAA is supportive of Policy SP 8.7, considers the Plan's mention of 'river banks' is inadequate. The Association feels very strongly that river buffer strips and corridors be provided. Paragraph (e) is inadequate and needs to include individual trees.	Policy SP 8.7 paragraph (e) needs to include individual trees.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". As stated in Policy SP 8.8, the designation of Local Landscape Policy Areas will be brought forward through the Local Policies Plan and will include those features which the Council considers appropriate for protection as directed by the SPPS.
LA03/DPS/0036	Antrim and District Angling Association	DM 40	ADAA notes and supports the inclusion of Carnmoney Hill as a Strategic Landscape Policy Area.	No specified modification.	Support noted and welcomed.
LA03/DPS/0036	Antrim and District Angling Association	DM 42	ADAA considers Policy DM 42.1 is positive and welcomes the inclusion of hedgerows, especially those that are native and which are of immense value for various reasons.	No specified modification.	Support noted and welcomed.
LA03/DPS/0036	Antrim and District Angling Association	DM 42	ADAA welcomes the reference to Trees and Development. However, the Association identifies that a significant weakness is the Council's lack of an appropriate response to sites under threat and the apparent lack of any action to protect trees and woodlands outwith development sites. Considers there are too many hedgerows and trees removed at development sites and developers must be required to provide replacement trees that are fit for purpose. Trees in around development areas are under immense threat and the Trust is of the view that such trees must be protected by TPO's, and the need to have an appropriate amenity tree valuation system in place. The comment of a net gain in tree numbers is seriously flawed. To protect 'potentially vulnerable trees' is a wholly inappropriate response. If the trees are valuable they should be protected.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that the policy provisions of Policy DM 42 will assist in protecting existing trees, as well as leading to the planting of new trees, in assessing development proposals across the Borough. The protection of trees through Tree Preservation Orders, must be made in accordance with the relevant legislative provisions.

LA03/DPS/0036	Antrim and District Angling Association	DM 45	ADAA is generally supportive of the policy approach. However, concern is expressed regarding river based hydro's and their potential impact on local wildlife.	No specified modification however reference should be made in the Plan to the protection of water based migratory fish and other wildlife.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the additional policy wording is not required as all policies within the Plan should be read together and any such proposals with potential to impact on the river environment will be considered through the normal Development Management process which will consider the LDP policies and other material planning considerations.
LA03/DPS/0036	Antrim and District Angling Association	SP 10	ADAA have requested for Rivers and Streams to be included in the list in the text at 13.9 Environmental Protection.	Policy wording to be included re: Rivers and Streams.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS . The rationale for the strategic policy is provided in the text "Why we have taken this approach".
LA03/DPS/0036	Antrim and District Angling Association	DM 46	ADAA have expressed concern regarding the redevelopment of flood plains. Flood plains need to be seen as a major asset not just for helping to alleviate flooding downstream but also as a mechanism to protect rivers. Flood plains are of enormous value for creating specialist habitats for many forms of wildlife.	The Plan should promote and legislate for the benefits of sustainable drainage in all developments.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Furthermore, the Council considers that Policy DM 47 clearly promotes a sustainable approach to drainage and flood risk management.
LA03/DPS/0036	Antrim and District Angling Association	DM 47	ADAA have expressed concern regarding additional surface water generated through various forms of development. ADAA have expressed support for the Council's approach subject to additional wording.	Policy to consider the following additions with regard to surface level water (1) slow drainage driveways in housing developments and other forms of sustainable development. (2) Other natural forms of storage of water such a reservoirs, ditches and dams to be retained and (3) A distinct preference of natural open and meandering ditches as opposed to concrete/plastic culverts and pipes is a key necessity and also wildlife benefit.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the suggested policy wording changes are not required, as the matters are adequately dealt with through the existing wording of Policies DM 47 and SP 10. See also suggested minor wording change to Policy DM 47.5.
LA03/DPS/0036	Antrim and District Angling Association	DM 52	ADAA have expressed general support for policy provisions, in particular reference to potential damage to the environment and human health. Council to ensure the investigation mechanism is fully professional and robust in nature.	No specified modification.	Support noted and welcomed.
LA03/DPS/0036	Antrim and District Angling Association	Miscellaneous	ADAA welcomes the Plan but wishes to emphasise that its lateness has contributed to many poor development decisions throughout the Borough.	No specified modification.	The DPS was published in Q1 2019-2020. DfI advised all Councils that three months either side of the published date of a Timetable was acceptable. The Council met this target and will continue to keep the LDP Timetable under review. A new timetable was published in October 2020.
LA03/DPS/0037	Virgin Media	SP 3	Virgin Media have requested broadband specific planning policies to be included within the LDP. Virgin Media also propose the Council publish SPG specific to telecommunication.	Whilst there was no specific modification to text put forward, the submission did include an example of an operational policy for the Promotion of Fibre to the Premises included in an English LDP.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers the issues raised are adequately covered in Policies SP 3.16, DM 16 and DM 25. The Council notes the suggestion for specific Supplementary Planning Guidance dealing with telecommunications and digital services and will consider the need for such SPG as the LDP process progresses. The Council considers that the assessment of proposals for telecommunication and digital services is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0038	David Wilson (O'Toole and Starkey)	SP 4	Mr. Wilson objects to the level of housing growth allocated to Ballyrobert, 35 units for the period 2015 to 2030, is unsustainable and does not meet the demands of the local community. Housing will be delivered exclusively through committed sites. Requests that the housing allocation figure for Ballyrobert is revisited and revised upwards to meet the needs of Ballyrobert and its residents. That the proposed lands at Ballyrobert and Mossley Roads, Ballyrobert outside of the present settlement limit, are included within a revised settlement limit and zoned for housing development.	That the housing allocation figure for Ballyrobert is revisited and revised upwards.	No change required. It is considered that the 35 unit housing allocation proposed for Ballyrobert is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Ballyrobert. It is considered that an increase in the overall housing allocation to Ballyrobert would be at odds with the considerations identified above. The DPS's evidence base for the housing allocation to Ballyrobert is set out in Evidence Paper 2: Settlement Evaluation, Evidence Paper 6: Housing. The Council has published Topic Paper 1: Housing Growth. These documents should be read for further information.

LA03/DPS/0038	David Wilson (O'Toole and Starkey)	Site Specific	Mr. Wilson has offered lands for housing development: Ballyrobert. Advises that the landowner is prepared to gift a portion of their lands to provide a car park to serve The Thompson Primary School were his lands to be included for development.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	Plan Vision	Corbo Properties supports the Vision as it shows the positive position the Council area should take come 2030 and reflects the Council aspirations for the area.	No specified modification	Support noted and welcomed.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	Strategic Objectives	Corbo Properties is generally supportive of Strategic Objectives 1 - 14.	No specified modification	Support noted and welcomed.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	SP 1	Corbo Properties is generally supportive specifically criterion (d) which aims to sustain and maintain the role of village such as Templepatrick as centres for housing and employment of an appropriate scale and character.	No specified modification	Support noted and welcomed.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	SP 2	Corbo Properties is generally supportive of up to 9,000 jobs being created/facilitated but would suggest that the figure is aligned upwards in line with an uplifted housing figure.	Revise job creation figure upwards to around 10,000 jobs in line with their revised housing growth figure.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS . The rationale for the strategic policy is provided in the text "Why we have taken this approach". As indicated in para. 5.8 of the DPS the potential growth of up to 9,000 jobs across the Borough is derived from the Council's published Economic Strategy.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	SP 4	Corbo properties considers the Council's housing growth figure underestimates housing need and is not reasonably flexible to enable it to deal with changing circumstances, i.e. unexpected growth and is not based on a robust evidence base. Considers the amount of housing growth for the Borough should be predicated on Option 3 as set out in the Council POP which will provide greater flexibility and better reflect the ambitious economic growth plan of neighbouring Belfast City Council. Following their own analysis suggests a revised housing growth figure of 11,220 units (or 14,960 units including a 5 year additional housing supply).	Revise housing growth figure to 11,220 units.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. The LDP process affords greater flexibility in the planning process by incorporating provisions for 5 years reviews and this will enable the Council to adapt the Plan in response to changing needs in circumstances, both regionally and locally. The Council is required to prepare an Annual Monitoring Report that will help inform whether change is required. Accordingly if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter. Whilst reliance for an uplift in the Borough's housing growth figure in this representation is made on the need for the Plan to accommodate the economic growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	SP 4	Corbo Properties consider the Housing Growth Allocation should be amended to focus on growing towns and selected villages per the Council preferred option in its POP and in light of the proposed increase to the Housing Growth Figure for the Borough, the allocation to Templepatrick should be increased to 241 units (or 322 units including a five year lands supply).	Redistribute increased level of growth in line with suggested table. Increase Housing Growth Allocation to Templepatrick to 241 units or 322 units.	No change required. It is considered that the 100 unit housing allocation proposed for Templepatrick is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework , the DfI response to the POP regarding the 5 year housing supply and the role and function of Templepatrick. It is considered that an increase in the overall housing allocation to Templepatrick would be at odds with the considerations identified above. The DPS's evidence base for the housing allocation to Templepatrick is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	DM 17	Corbo Properties object to inclusion of Lifetimes Homes requirement with DM 17.1 (d). Although supportive of Lifetime Homes approach, it should be brought forward through the Building Regulations rather than planning requirements, as in England. The requirement poses another design challenge which may not be achievable on all sites, specifically those constrained in terms of size.	Delete policy DM 17.1(d).	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the inclusion of Lifetime Homes as part of the planning design requirements is not considered unacceptably onerous and the requirement for a proportion of new homes to be designed to Lifetime Homes standards will assist in the creation of a welcoming and accessible environment and encourage the creation of more balanced communities.

LA03/DPS/0039	Corbo Properties (Gravis Planning)	DM 17	Corbo Properties object to the threshold identified for Affordable Housing of 40 units which should be increased to 50 units to align with 'major' residential development proposals. Also proposals should only be required to deliver affordable housing units where there is an established need identified within the settlement or locality.	Revise the threshold in policy DM 17.3 to 50 units and only require affordable housing units where there is an identified need in a settlement or locality.	<p>No change required. It is considered that the policy is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>In order to provide certainty for all parties, the policy should be applied consistently, with the expectation that all proposals of 40 units or greater will be required to deliver affordable units.</p> <p>It is recognised from the NIHE Housing Needs Assessment that there is an affordable housing need across the entire Borough. If policy DM 17.3 was only to be applied to those settlements or geographical locations where a need has been identified, this could significantly undermine the potential of the policy to meet the overall needs of the Borough.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>
LA03/DPS/0039	Corbo Properties (Gravis Planning)	Monitoring	Corbo Properties support the Monitoring Framework but suggest amending SP 2 to 10,000 jobs (to reflect request for an uplift in the number of homes - 11, 220) in order to ensure accurate monitoring of the plan.	SP 2 - uplift from 9,000 jobs to 10,000 jobs	No change required. As the Council has already indicated no change to the jobs figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	Monitoring	Corbo Properties support the Monitoring Framework but suggest amending SP4 to 11,220 homes to ensure accurate monitoring of the plan,	SP 4 - uplift from 9,750 homes to 11,220 homes	No change required. As the Council has already indicated no change to the housing growth figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	Site Specific	<p>Corbo Properties carried out a review of undeveloped lands in Templepatrick identifies there are currently no available lands suitable for development within the current settlement limit.</p> <p>Alternative suitable lands that can be more readily developed should be considered by the Council to deliver a sufficient supply of housing over the plan period.</p>	No specified modification	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and further updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0039	Corbo Properties (Gravis Planning)	Site Specific	Corbo Properties offered subject lands for housing development; Templepatrick	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	Plan Vision	Mss Joyce and Hazel Bill support the Vision as it shows the positive position the Council area should take, come 2030 and reflects the Council aspirations for the area.	No specified modification.	Support noted and welcomed.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	Strategic Objectives	Mss Joyce and Hazel Bill are generally supportive of Strategic Objectives 1 - 14.	No specified modification.	Support noted and welcomed.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	SP 1	Mss Joyce and Hazel Bill are generally supportive specifically criterion (d) which aims to sustain and maintain the role of villages such as Templepatrick as centres for housing and employment of an appropriate scale and character.	No specified modification.	Support noted and welcomed.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	SP 2	Mss Joyce and Hazel are generally supportive of 9000 jobs being created but would suggest that the figure is aligned upwards in line with an uplifted housing figure.	Revise job creation figure upwards to around 10,000 jobs in line with their revised housing growth figure.	<p>No change required.</p> <p>The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>As indicated in para. 5.8 of the DPS, the potential growth of up to 9,000 jobs across the Borough is derived from the Council's published Economic Strategy.</p>

LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	SP 3	Mss Joyce and Hazel Bill are supportive of Policy SP 3 and encourage the improvement of infrastructure such as Wi-Fi and super-fast broadband services.	No specified modification.	Support noted and welcomed.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	SP 3	Mss Joyce and Hazel Bill consider high quality transportation links facilitate the effective and efficient movement across the Borough and supports inward investment and helps maintain a vibrant economy within the Council area. Encourage updates to transportation infrastructure (Ballymartin Park and Ride, Templepatrick).	No specified modification.	Support noted and welcomed.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	DM 14	Mss Joyce and Hazel Bill consider good quality public utilities are a pre-requisite to facilitating the development within the Borough. High quality infrastructure facilitates the effective and efficient movement across the Borough and support inward investment and help maintain a vibrant economy within the Council area.	No specified modification.	Support noted and welcomed.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	DM 16	Mss Joyce and Hazel are supportive of policy which aims to support improvement of Wi-Fi and super-fast broadband services across the Council , and continued access to national and international markets.	No specified modification.	Support noted and welcomed.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	SP 4	Mss Joyce and Hazel Bill consider the Council's housing growth figure underestimates housing need and is not reasonably flexible to enable it to deal with changing circumstances, i.e. unexpected growth and is not based on a robust evidence base. Considers the amount of housing growth for the Borough should be predicated on Option 3 as set out in the Council POP which will provide greater flexibility and better reflect the ambitious economic growth plan of neighbouring Belfast City Council. Following their own analysis suggests a revised housing growth figure of 11,220 units (or 14,960 units including a 5 year additional housing supply).	Revise housing growth figure to 11,220 units.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. The LDP process affords greater flexibility in the planning process by incorporating provisions for 5 years reviews and this will enable the Council to adapt the Plan in response to changing needs in circumstances, both regionally and locally. The Council is required to prepare an Annual Monitoring Report that will help inform whether change is required. Accordingly if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter. Whilst reliance for an uplift in the Borough's housing growth figure in this representation is made on the need for the Plan to accommodate the economic growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	SP 4	Mss Joyce and Hazel Bill request that the Housing Growth Allocation should be amended to focus on growing towns and selected villages per the Council preferred option in its POP and in light of the proposed increase to the Housing Growth Figure for the Borough, the housing growth allocation for Templepatrick should be increased to 241 units (or 322 units including a 5 year additional housing supply).	Redistribute increased level of growth in line with suggested table. Increase Housing Growth Allocation to Templepatrick to 241 units or 322 units.	No change required. It is considered that the 100 unit housing allocation proposed for Templepatrick is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework, the DfI response to the POP regarding the 5 year housing supply and the role and function of Templepatrick. It is considered that an increase in the overall housing allocation to Templepatrick would be at odds with the considerations identified above. The DPS's evidence base for the housing allocation to Templepatrick is set out in Evidence Paper 2: Settlement Evaluation, Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	DM 17	Mss Joyce and Hazel Bill object to the inclusion of Lifetimes Homes requirement with Policy DM 17.1 (d). Although supportive of Lifetime Homes approach, it should be brought forward through the Building Regulations rather than planning requirements, as in England. The requirement poses another design challenge which may not be achievable on all sites, specifically those constrained in terms of size.	Delete policy DM 17.1(d).	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the inclusion of Lifetime Homes as part of the planning design requirements is not considered unacceptably onerous and the requirement for a proportion of new homes to be designed to Lifetime Homes standards will assist in the creation of a welcoming and accessible environment and encourage the creation of more balanced communities.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	DM 17	Mss Joyce and Hazel Bill object to the threshold identified for Affordable Housing of 40 units which should be increased to 50 units to align with 'major' residential development proposals. Also proposals should only be required to deliver affordable housing units where there is an established need identified within the settlement or locality.	Revise the threshold in Policy DM 17.3 to 50 units and only require affordable housing units where there is an identified need in a settlement or locality.	No change required. It is considered that the policy threshold in relation to Affordable Housing is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. In order to provide certainty for all parties, the policy should be applied consistently, with the expectation that all proposals of 40 units or greater will be required to deliver affordable units. It is recognised from the NIHE Housing Needs Assessment that there is an affordable housing need across the entire Borough. If Policy DM 17.3 was only to be applied to those settlements or geographical locations where a need has been identified, this could significantly undermine the potential of the policy to meet the overall needs of the Borough. The Council has now published Topic Paper 2: Affordable Housing which further updates its position on affordable housing. This document should be read for further information.

LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	DM 24	Mss Joyce and Hazel Bill support Policy DM 24 and encourage the creation of community facilities both within settlements and within the countryside.	No specified modification.	Support noted and welcomed.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	Monitoring	Mss Joyce and Hazel Bill support the Monitoring Framework but suggest amending SP 2 to 10,000 jobs (to reflect request for an uplift in the number of homes - 11, 220) in order to ensure accurate monitoring of the Plan.	SP 2 - uplift from 9,000 jobs to 10,000 jobs	No change required. As the Council has already indicated no change to the jobs figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	Monitoring	Mss Joyce and Hazel Bill support the Monitoring Framework but suggest amending SP4 to 11,220 homes to ensure accurate monitoring of the plan,	SP 4 - uplift from 9,750 homes to 11,220 homes	No change required. As the Council has already indicated no change to the housing growth figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	Site Specific	Mss Joyce and Hazel Bill's review of undeveloped lands in Templepatrick identifies there are currently no available lands suitable for development within the current settlement limit. Alternative suitable lands that can be more readily developed should be considered by the Council to deliver a sufficient supply of housing over the plan period.	No specified modification.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and further updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0040	Joyce & Hazel Bill (Gravis Planning)	Site Specific	Mss Joyce and Hazel Bill offer subject lands for housing development: Templepatrick	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	Plan Vision	Eastwood Estate Agents support the Plan's Vision as it shows the positive position the Council area should take, come 2030 and reflects the Council aspirations for the area.	No specified modification.	Support noted and welcomed.
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	Strategic Objectives	Eastwood Estate Agents are generally supportive of Strategic Objectives 1 - 14.	No specified modification.	Support noted and welcomed.
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	SP 1	Eastwood Estate Agents are generally supportive of the Spatial Growth Strategy (Policy SP 1.6), specifically criterion c which aims to consolidate the role of towns of Crumlin and Randalstown as local service centres for housing, employment, facilities and services to support a growing population and its wider rural hinterland.	No specified modification.	Support noted and welcomed.
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	SP 2	Eastwood Estate Agents are generally supportive of 9,000 jobs being created but would suggest that the figure is aligned upwards in line with an uplifted housing figure.	Revise job creation figure upwards to around 10,000 jobs in line with their revised housing growth figure.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". As indicated in para. 5.8 the potential growth of up to 9,000 jobs across the Borough is derived from the Council's published Economic Strategy.

LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	SP 4	Eastwood Estate Agents consider the Council's housing growth figure underestimates housing need and is not reasonably flexible to enable it to deal with changing circumstances, i.e. unexpected growth and is not based on a robust evidence base. Considers the amount of housing growth for the Borough should be predicated on Option 3 as set out in the Council POP which will provide greater flexibility and better reflect the ambitious economic growth plan of neighbouring Belfast City Council. Following their own analysis suggests a revised housing growth figure of 11,220 units (or 14,960 units including a 5 year additional housing supply).	Revise housing growth figure to 11,220 units.	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>The LDP process affords greater flexibility in the planning process by incorporating provisions for 5 years reviews and this will enable the Council to adapt the Plan in response to changing needs in circumstances, both regionally and locally. The Council is required to prepare an Annual Monitoring Report that will help inform whether change is required.</p> <p>Accordingly if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.</p> <p>Whilst reliance for an uplift in the Borough's housing growth figure in this representation is made on the need for the Plan to accommodate the economic growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.</p>
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	SP 4	Eastwood Estate Agents consider the Housing Growth Allocation should be amended to focus on growing towns and selected villages per the Council preferred option in its POP and in light of the proposed increase to the Housing Growth Figure for the Borough, the allocation for Crumlin should be increased to 561 units (or 748 units including a 5 year additional housing supply).	Redistribute increased level of growth in line with suggested table. Increase Housing Growth Allocation to Crumlin to 561 units or 748 units.	<p>No change required. It is considered that the 350 unit housing allocation proposed for Crumlin is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework, the DfI response to the POP regarding the 5 year housing supply and the role and function of Crumlin. It is considered that an increase in the overall housing allocation to Crumlin would be at odds with the considerations identified above.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	DM 17	Eastwood Estate Agents object to inclusion of Lifetimes Homes requirement with DM 17.1 (d). Although supportive of Lifetime Homes approach, it should be brought forward through the Building Regulations rather than planning requirements, as in England. The requirement poses another design challenge which may not be achievable on all sites, specifically those constrained in terms of size.	Delete policy DM 17.1 (d).	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers the inclusion of Lifetime Homes as part of the planning design requirements is not considered unacceptably onerous and the requirement for a proportion of new homes to be designed to Lifetime Homes standards will assist in the creation of a welcoming and accessible environment and encourage the creation of more balanced communities.</p>
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	DM 17	Eastwood Estate Agents object to the threshold identified for Affordable Housing of 40 units which should be increased to 50 units to align with 'major' residential development proposals. Also proposals should only be required to deliver affordable housing units where there is an established need identified within the settlement or locality.	Revise the threshold in Policy DM 17.3 to 50 units and only require affordable housing units where there is an identified need in a settlement or locality.	<p>No change required. It is considered that the policy is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS.</p> <p>In order to provide certainty for all parties, the policy should be applied consistently, with the expectation that all proposals of 40 units or greater will be required to deliver affordable units.</p> <p>It is recognised from the NIHE Housing Needs Assessment that there is an affordable housing need across the entire Borough. If Policy DM 17.3 was only to be applied to those settlements or geographical locations where a need has been identified, this could significantly undermine the potential of the policy to meet the overall needs of the Borough.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	Monitoring	Eastwood Estate Agents support the Monitoring Framework but suggest amending Policy SP 2 to 10,000 jobs (to reflect request for an uplift in the number of homes - 11, 220) in order to ensure accurate monitoring of the plan.	SP 2 - uplift from 9,000 jobs to 10,000 jobs	No change required. As the Council has already indicated no change to the jobs figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	Site Specific	Eastwood Estate Agent's review of undeveloped lands in Crumlin identifies there are currently no available lands suitable for development within the current settlement limit until the new LDP is adopted in the mid 2020's and beyond. If additional lands are not released outside of the settlement limit or numbers are not increased, future housing pressure within Crumlin is inevitable.	No specified modification	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and further updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	Site Specific	Eastwood Estate Agents offer subject lands or housing development: Crumlin.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.

LA03/DPS/0041	Eastwood Estate Agents (Gravis Planning)	Monitoring	Eastwood Estate Agents support the Monitoring Framework but suggest amending Policy SP4 to 11,220 homes to ensure accurate monitoring of the plan,	Policy SP 4 - uplift from 9,750 homes to 11,220 homes	No change required. As the Council has already indicated no change to the housing growth figure is required, consequently the Indicative Monitoring Framework as drafted is considered to be appropriate and reasonable.
LA03/DPS/0042	Inaltus Limited	DM 6	Inaltus Ltd. have expressed concern that Policy DM 6 deals with all proposals inside town centres and therefore the policy requires retail proposals to demonstrate how they will contribute to vitality and viability, maintain visual amenity and support footfall etc. Inaltus Ltd. considers this is a blunt approach, as retail uses in town centres should be acceptable in principle. The policy approach provides an unnecessary hurdle and will not encourage investment in town centres.	Policy DM 6.1 should be reworded as follows: "All non-retail development proposals will be required to demonstrate that they will..."	Open to minor change. Overall the Council considers the broad thrust of Policy DM 6 as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The provisions of the policy as drafted are not considered unduly onerous and their application through the normal Development Management process is intended to help ensure that all proposals, including retail schemes, will promote the positive role and help sustain the vitality and viability of the Borough's centres. Nevertheless, the Council notes the concern raised in this and other representations regarding its application in relation to retail proposals in a town centre and is open to a number of minor textual changes to make the policy intent clear. The Council is suggesting the following minor textual changes in response to the representations for the purposes of clarification in relation to the application of Policy DM 6. The suggested change involves dropping 6.1 (c) and recasting the remaining text. The suggested text simply clarifies the policy intent and does not introduce a new policy concept as the original text in DM 6.1 (a) and (b) covered these points. Furthermore, the Council is content that the deletion of 6.1 (c) does not diminish the policy intent. It is clear when the DPS and its evidence base are read together that the DPS seeks to recognise and promote the Borough's town, district and local centres as the most appropriate location for retail development and other employment, leisure and cultural uses and this remains the case with the minor changes suggested. Suggested minor change DM 6.1(a) – (c), page 98 to "DM 6.1: The Council local needs. All development proposals should contribute positively to the vitality and viability of the centre, and will be required to demonstrate that they will maintain or enhance the visual amenity of the area by providing an active and attractive frontage appropriate to the location."
LA03/DPS/0043	Tamar Selby (Inaltus Ltd)	Strategic Objectives	Tamar Selby considers that the Strategic Objectives are not ambitious enough. Strategic Objective 3 only allows for 'a 'range' and 'quality of land and premises to facilitate business growth'. SPPS para. 6.92 states "A fundamental role for LDPs is to ensure that there is ample supply of suitable land available to meet economic development needs within the plan area".	Strategic Objective 3 should be amended to encourage an "ample" supply of economic development lands..."	No change required. The Council considers the objective as drafted is appropriate and reasonable. It has taken account of the provisions of the SPPS and RDS. Section 3 of the DPS sets out the context in which objectives were prepared. Providing a range and quality of land, read alongside the policies in the DPS aligns with the SPPS requirement.
LA03/DPS/0043	Tamar Selby (Inaltus Ltd)	SP 2	Tamar Selby endorses the provisions of Strategic Policy 2 insofar as it advocates provision of 9,000 new jobs by 2030.	No specified modification.	Support noted and welcomed.
LA03/DPS/0043	Tamar Selby (Inaltus Ltd)	SP 2	Tamar Selby considers that reference to a 'range' of sites within Policy SP 2.2 is not consistent with the SPPS (para. 6.92) requirement for an 'ample' supply of lands. Considers that the DPS does not take proper account of the SPPS in respect of the requirement for ample supply of economic development lands.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".
LA03/DPS/0043	Tamar Selby (Inaltus Ltd)	SP 2	Tamar Selby endorses the Council's approach to the identification of Nutts Corner as an SEL (and its inclusion as such within Table 3).	No specified modification.	Support noted and welcomed.
LA03/DPS/0043	Tamar Selby (Inaltus Ltd)	DM 1	Tamar Selby considers that Policy DM 1.1 seeks to curtail the type of uses within Nutts Corner SEL. Considers that there is no justification to single out Nutts Corner in this way and ignores the fact that client's lands have permission for office use. Considers the Council have set out no grounds as to why Nutts Corner should be prejudiced in this way. Also considers the Council should not distinguish Nutts Corner from other SELs that would undermine its opportunity to be successful.	The last sentence of DM 1.1 should be deleted.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Policy DM 1.1 should be read alongside Policy SP 2 which refers to the ELER as set out in Evidence Paper 3: Economic Growth, which supports the identification of a range of existing SELs including the strategically located Nutts Corner site. Nutts Corner is already home to a number of large-scale businesses that are focused on storage and distribution as well as industry. These require accessible and central locations with easy access to the RSTN and gateways. As such, Nutts Corner has been identified as a Strategic Employment Location with uses limited to industrial development, transport and logistics and storage and distribution proposals. B1 business uses are directed towards our settlements and gateways in order to promote sustainable development and deliver our Spatial Growth Strategy which has been informed and is consistent with the RDS. Furthermore, all Strategic Employment Locations are clearly set out at Figure 4, page 86 of the Plan.

LA03/DPS/0043	Tamar Selby (Inaltus Ltd)	Evidence Paper 3: Economic Growth	Tamar Selby recognises that the Council has identified substantial evidence to demonstrate and support the inclusion of Nutts Corner as a SEL.	No specified modification.	Support noted and welcomed.
LA03/DPS/0043	Tamar Selby (Inaltus Ltd)	Site Specific	Tamar Selby have identified subject lands to be considered for inclusion in SEL designation: Nutts Corner.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0044	Bill Porter (Inaltus Ltd)	Strategic Objectives	Mr. Porter considers that Strategic Objective 8 should be re-worded to 'ensure a generous supply...' Considers that the Borough is underperforming in housing delivery and the Council must act to ensure adequate housing is provided and this requires a significant boost to housing supply.	Strategic Objective 8 should state, 'Ensure a 'generous' supply of land for new homes, provide a diverse choice of housing and strengthen community cohesion'.	No change required. The Council considers the Plan's Strategic Objective 8 as drafted is appropriate and reasonable and has taken account of the provisions of the SPPS and RDS. Section 3 of the DPS sets out the context in which objectives were prepared. The Council's wording in the Plan takes account of that chosen in the SPPS which states the Regional Strategic Policy approach must be to facilitate an 'adequate' and available supply of housing to meet the needs of everyone (Para 6.136, page 69).
LA03/DPS/0044	Bill Porter (Inaltus Ltd)	SP 1	Mr. Porter considers that the Spatial Growth Strategy should be amended to include Crumlin alongside Ballyclare as a second tier town. Welcomes Policy SP 1.6 (f) in its recognition of Belfast International Airport and Nutts Corner, given the close proximity of these Strategic Employment Locations to Crumlin.	Amend Policy SP 1.6 (b) to read 'Consolidate and grow the role of the large towns of Ballyclare and Crumlin as key centres for housing, employment, facilities and services to support a growing population and their wider rural hinterland'. Remove Crumlin from Policy SP 1.6 (c). Amend Table 1 to have Crumlin and Ballyclare as tier 2 settlements. Amend text such as para 4.7 and the Map at Figure 3 to reflect changes in the settlement hierarchy.	No change required. The Council considers the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the Strategic policy approach is set out in "Why we have taken this approach". The Council's further justification for the Plan's proposed designation of Crumlin as a Tier 4 'Town' is clearly set out in supporting Evidence Paper 2: Settlement Evaluation including paras. 8.23-8.30 and pages 51-53. Support for recognition of Nutts Corner and Airport is noted and welcomed.
LA03/DPS/0044	Bill Porter (Inaltus Ltd)	SP 2	Mr. Porter endorses the Council's strategy in seeking to create 9,000 jobs in the Borough by 2030.	No specified modification.	Support noted and welcomed.
LA03/DPS/0044	Bill Porter (Inaltus Ltd)	SP 2	Mr. Porter supports the focus on Nutts Corner and Belfast International Airport in Policy SP 2.2 and welcomes Table 3 which identifies Nutts Corner and Belfast International Airport as Existing Strategic Employment Locations.	No specified modification.	Support noted and welcomed.
LA03/DPS/0044	Bill Porter (Inaltus Ltd)	SP 3	Mr. Porter considers that the DPS should aspire to reintroduce operational railway routes through Crumlin.	Include a reference within Policy SP 3.2 to the re-opening of the railway line which runs through Crumlin.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council will continue to work with its statutory partners and DfI Transport with regard to the viability of future transport schemes (including cross boundary issues) as transport plans and local policies plan progress.
LA03/DPS/0044	Bill Porter (Inaltus Ltd)	SP 4	Mr. Porter objects to the proposed housing growth figure of 9,750 units and considers it is too low. The representation includes an extensive Housing Working Paper which contends that the Council has failed to take into account a range of factors in the identification of a realistic housing growth figure, housing allocation for the Borough and its approach to the estimation of housing supply.	The housing needs calculation be reviewed and the Plan Strategy be amended to reflect proposed housing growth figure of at least 15,600 units.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.

LA03/DPS/0044	Bill Porter (Inaltus Ltd)	SP 4	<p>Mr. Porter considers that the housing growth allocation to settlements should be amended in line with the table identified on page 20 of the representation.</p> <p>The housing growth allocation for Crumlin should be increased to 1,248 units, as its position in the spatial hierarchy is similar to that of Ballyclare. Proposed housing allocation to Crumlin is much too low to incentivise private sector to provide social and affordable homes.</p> <p>The representation includes an extensive Housing Working Paper which contends that the Council has failed to take into account a range of factors in the identification of a realistic housing growth figure, housing allocation for the Borough and its approach to the estimation of housing supply.</p>	<p>Redistribute increased level of growth in line with suggested table. Increase Housing Growth Allocation to Crumlin to 1,248 units to reflect important role of Crumlin and Antrim.</p>	<p>No change required. It is considered that the 350 unit housing allocation proposed for Crumlin is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Crumlin. It is considered that an increase in the overall housing allocation to Crumlin would be at odds with the considerations identified above.</p> <p>The DPS's evidence base for the housing allocation to Crumlin is set out in Evidence Paper 2: Settlement Evaluation, Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0044	Bill Porter (Inaltus Ltd)	SP 4	<p>Mr. Porter considers the Council's approach to housing supply is insufficient to confidently predict the deliverable supply. Prejudicial to outcome of plan process to include statement in paragraph 7.14.</p>	<p>Review suggested housing land supply to ascertain which sites are developable and what deliverability is likely to be over the plan period.</p> <p>Paragraph 7.14 should be amended to recognise that Crumlin has a very limited supply of housing land and there will be a case for increased land in Crumlin.</p>	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and further updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0044	Bill Porter (Inaltus Ltd)	Site Specific	<p>Mr. Porter offers subject lands or housing development: Crumlin.</p>	<p>Inclusion/zoning of land for development.</p>	<p>Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p>
LA03/DPS/0044	Bill Porter (Inaltus Ltd)	Miscellaneous	<p>Mr. Porter considers that the presentation of the DPS is unclear and merges policies with supporting text. The Plan Vision, Strategies, Policies and Allocations need to be reworked to be set out clearly.</p>	<p>Clearly set out specific policies in policy boxes within the document and clearly distinguish supporting text from policy.</p>	<p>No change required. The Council considers that the DPS Section on 'how to use this document' clearly explains how the DPS is set out. It considers that the issues raised are already addressed in the presentation of the DPS as published.</p>
LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	Strategic Objectives	<p>Mr. McCabe considers that Strategic Objective 8 should be re-worded to 'ensure a generous supply...' Considers that the Borough is underperforming in housing delivery and the Council must act to ensure adequate housing is provided and this requires a significant boost to housing supply.</p>	<p>Strategic Objective 8 should state, 'Ensure a 'generous' supply of land for new homes, provide a diverse choice of housing and strengthen community cohesion'.</p>	<p>No change required. The Council considers the Plan's Strategic Objective 8 as drafted is appropriate and reasonable and has taken account of the provisions of the SPPS and RDS. Section 3 of the DPS sets out the context in which objectives were prepared.</p> <p>The Council's wording in the Plan takes account of that chosen in the SPPS which states the Regional Strategic Policy approach must be to facilitate an 'adequate' and available supply of housing to meet the needs of everyone (Para 6.136, page 69).</p>
LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	SP 1	<p>Mr. McCabe considers that whilst Antrim has been included with Metropolitan Newtownabbey as a top tier settlement town in the Spatial Growth Strategy, see Policy SP 1.6(a), however Table 1 and the housing allocation appear to distinguish the two settlements.</p> <p>Considers that there is no guidance within the RDS as to the role and function of Newtownabbey and therefore there is no justification to include it in a higher tier of settlement above Antrim, which is clearly defined in the RDS as a Main Hub. Also concerned that Antrim will not be able to compete with nearby Ballymena as a tier 1 settlement.</p>	<p>Reclassify Antrim as a Tier 1 Settlement and amend Map at Figure 3.</p>	<p>No change required. The Council considers that the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the approach taken is set out in "Why we have taken this approach".</p> <p>The Council do not consider there is any ambiguity in the Plan's Spatial Growth Strategy and the 'Places of our Borough'.</p> <p>Metropolitan Newtownabbey is the largest settlement in the Borough with a wide range of services and infrastructure and is defined in the top tier of the settlement hierarchy as the Metropolitan Urban Area (MUA). It is identified as part of the BMUA in the RDS.</p> <p>Antrim is the second largest populated settlement in the Borough with a wide range of services and infrastructure and is defined in the second tier of the settlement hierarchy as a Major Hub Town. It is identified as a Main Hub in the RDS. Ballymena and Antrim are identified as a cluster of hubs in the RDS and the Council's DPS seeks to strengthen the role of Antrim.</p> <p>The two different tiers reflect the role and functions of both settlements. Further justification for the Plan's Settlement Hierarchy relating to Metropolitan Newtownabbey and Antrim is set out in the Plan's accompanying Evidence Paper 2: Settlement Evaluation including para 8.14-8.15 and pages 33-42.</p>
LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	SP 2	<p>Mr. McCabe endorses the Council strategy in seeking to create 9,000 jobs in the Borough by 2030.</p>	<p>No specified modification</p>	<p>Support noted and welcomed.</p>
LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	SP 2	<p>Mr. McCabe supports the focus on Antrim in Policy SP 2.2. Welcomes Table 3 that identifies 8 SELs in Antrim. It is notable that this is two more than the 6 SELs identified for Metropolitan Newtownabbey.</p>	<p>No specified modification</p>	<p>Support noted and welcomed.</p>

LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	SP 2	Mr. McCabe notes the identification of Antrim alongside the Abbey Centre as both large town centres. Endorses this position and considers that this reinforces the case to include Antrim as a Tier 1 town.	No specified modification.	Support noted and welcomed.
LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	SP 4	Mr. McCabe objects to proposed housing growth figure of 9,750 units and considers it is too low. The representation includes an extensive Housing Working Paper which contends that the Council has failed to take into account a range of factors in the identification of a realistic housing growth figure, housing allocation for the Borough and its approach to the estimation of housing supply.	The housing needs calculation be reviewed and the Plan Strategy be amended to reflect proposed housing growth figure of at least 15,600 units.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.
LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	SP 4	Mr. McCabe considers that the housing growth allocation to settlements should be amended in line with the table identified on page 20 of the representation. The representation includes an extensive Housing Working Paper which contends that the Council has failed to take into account a range of factors in the identification of a realistic housing growth figure, housing allocation for the Borough and its approach to the estimation of housing supply.	Redistribute increased level of growth in line with suggested table. Increase Housing Growth Allocation to Antrim to 5,304 units.	No change required. It is considered that the proposed housing allocation is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of settlements. It is considered that the amendment proposed in the representation would be at odds with the considerations identified above. The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	SP 4	Mr. McCabe considers that the approach the Council has taken is insufficient to confidently predict the deliverable housing supply. Considers that it is prejudicial to outcome of plan process to include the statement in paragraph 7.14. The representation includes an extensive Housing Working Paper which contends that the Council has failed to take into account a range of factors in the identification of a realistic housing growth figure, housing allocation for the Borough and its approach to the estimation of housing supply.	Review suggested housing land supply to ascertain which sites are developable and what deliverability is likely to be over the plan period. Paragraph 7.14 should be amended to recognise that Antrim will require a release of suitably located housing land.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and further updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	Site Specific	Mr. McCabe requests subject lands be considered for housing development: Antrim.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0045	Iain McCabe (Inaltus Ltd)	Miscellaneous	Mr. McCabe considers that the presentation of the DPS is unclear and merges policies with supporting text. The Plan Vision, Strategies, Policies and Allocations need to be reworked to be set out clearly.	Clearly set out specific policies in policy boxes within the document and clearly distinguish supporting text from policy.	No change required. The Council considers that the DPS Section on 'how to use this document' clearly explains how the DPS is set out. It considers that the issues raised are already addressed in the presentation of the DPS as published.
LA03/DPS/0046	Autism NI	Equality	Autism NI states that there is a legal requirement upon all public bodies to take account of the social and communication barriers faced by individuals with autism in accessing public services and public facilities. They continue by stating six examples of barriers experienced by people with Autism. Further request for staff training for early identification and appropriate intervention for autism related issues.	No specified modification.	Comments noted and no change required. The Council considers that there are no matters raised in the response that call into question the contents of the Draft Plan Strategy or the principle of any of the policies set out therein.
LA03/DPS/0047	Colin O'Callaghan	DM 18 A	O'Callaghan Planning considers that Policy DM 18.3 precludes farm dwellings where the farm has not been continuously active for the last 6 years and there are genuine instances of where long established farm businesses have been interrupted. Considers the policy as inflexible. Considers that the provision of one dwelling on a farm in a 10 year period is inadequate and not reasonably flexible.	Remove the word 'continuous' from Policy 18.3 (a). Weight should be given to farm businesses that are more than 6 years old but which have experienced temporary periods of dormancy within the last 6 years.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of and is broadly consistent with the provisions of the SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that inclusion of the word 'continuous' provides clarity for decision makers and is not unreasonable in the context of assessing an application for a new farm dwelling. It is acknowledged that exceptional circumstances may exist in particular cases where a proposal does not fulfil all elements of relevant policy. However, the Council considers this matter is something that can be dealt with at planning application stage through the normal Development Management process which will require the use of judgement as part of the assessment of proposals on their individual merits taking account of the policy provisions of the DPS, relevant guidance and other material considerations. No rationale is provided to support the provision of more than one dwelling in a 10 year period.

LA03/DPS/0047	Colin O'Callaghan	DM 18 B	O'Callaghan Planning considers that Policy DM 18.7 could be enhanced by providing for the replacement of buildings recently destroyed as these are neither structurally complete nor reduced to wall steads.	Provision should be made for the replacement of a structure that is neither substantially intact nor reduced to wall steads, particularly where it has been recently destroyed by accident or fire.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy"; Policy DM 18.11 clearly allows for the circumstances for the replacement of a dwelling which has been recently damaged by recent accident or fire, in addition to substantially intact dwellings or wall steads of former dwellings.
LA03/DPS/0047	Colin O'Callaghan	DM 18 C	O'Callaghan Planning considers that provision for dwellings within a built up frontage is more stringent than in other Districts.	The requirement for five or more substantial buildings should be reduced to three, and ancillary buildings should not be automatically discounted where they are clearly visible on a frontage or are located to the side of a main building.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of and is broadly consistent with the provisions of the SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council's Spatial Growth Strategy (Policy SP1.6) seeks, amongst other matters, to sustain and maintain the Borough's rural area through the accommodation of small scale housing opportunities in the countryside whilst resisting ribbon development and urban sprawl (Policy SP 1.12). This accords with the strategic advice provided in both the RDS and SPPS. In making provision for infill dwellings in the countryside, the Council considers the detailed definition provided in the policy of a substantial and closely built up frontage (five or more substantial buildings including at least three dwellings) to be both reasonable and appropriate, particularly given the pressures arising for infill development across the Council's rural area much of which historically formed part of the Belfast Urban Area Green Belt. The policy seeks to address deficiencies recognised in the current operational policy (Policy CTY 8 of PPS 21) which the Planning Appeals Commission has previously indicated was both confusing and contradictory in that its provisions expressly allowed for the creation of ribbon development despite its clear opposition to such a form of development (e.g. PAC Appeal 2011/A0277). The Council's policy provides clarity for both applicants and those making decisions on such development in the future, and is intended to maintain appropriate opportunities for infill dwellings in line with the provisions of the SPPS, whilst at the same time seeking to prevent ribbon development in order to help protect the intrinsic value of the Borough's countryside.
LA03/DPS/0047	Colin O'Callaghan	DM 18 D	O'Callaghan Planning considers that provision for dwellings at an existing cluster is more stringent than in other Districts, particularly in terms of excluding 'ancillary buildings'. If farm and ancillary buildings are excluded there may be difficulty in achieving the requisite number of buildings.	Ancillary buildings ought to be included on a case by case basis. The requirement to be bounded on at least two sides ought to be amended, so a provision can be made for the development of a dwelling on a single quadrant at a crossroads where all three others are developed.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council's Spatial Growth Strategy (Policy SP 1.6) seeks, amongst other matters, to sustain and maintain the Borough's rural area through the accommodation of small scale housing opportunities in the countryside whilst resisting ribbon development and urban sprawl (Policy SP 1.12). This accords with the strategic advice provided in both the RDS and SPPS. In making provision for dwellings in an existing cluster in the countryside the Council considers the policy provisions to be both reasonable and appropriate, particularly given the pressures arising for such development across the Council's rural area much of which historically formed part of the Belfast Urban Area Green Belt. The policy seeks to address deficiencies recognised in the current operational policy (Policy CTY 2a of PPS 21). The Council's policy provides clarity for both applicants and those making decisions on such development in the future and is intended to maintain appropriate opportunities for new dwellings in existing clusters in line with the provisions of the SPPS, whilst at the same time seeking to protect the intrinsic value of the Borough's countryside.
LA03/DPS/0047	Colin O'Callaghan	DM 18 F	O'Callaghan Planning considers that provision for 'barn conversions' is unduly restrictive insofar as it is restricted to 'locally important' buildings. Whilst the policy is consistent with the SPPS, uncertainty exists around the review of the SPPS and whether this requirement would have been removed.	Provision should be extended to provide for conversion of 'suitable' buildings (removing the locally important test).	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council's Spatial Growth Strategy (Policy SP 1.6) seeks, amongst other matters, to sustain and maintain the Borough's rural area through the accommodation of small scale housing opportunities in the countryside which accords with the strategic advice provided in both the RDS and SPPS. The Council considers that the removal of the words 'locally important' from the policy would represent a significant departure from the SPPS which could lead to an unsustainable relaxation of policy for conversion of buildings to dwellings in the countryside.
LA03/DPS/0048	Colin O'Callaghan	DM 5	O'Callaghan Planning considers Policy DM 5.1 precludes farm diversification for any project that has not been active for the last six years continuously. Considers the policy is not flexible, nor does it appear to have taken account of all relevant alternatives.	The word 'continuous' should be removed. Weight should be given to farm businesses that are more than six years old, but which have experienced temporary periods of dormancy within the last 6 years.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that inclusion of the word 'continuous' provides clarity for decision makers and is not unreasonable in the context of assessing an application for a farm diversification scheme. It is acknowledged that exceptional circumstances may exist in particular cases where a proposal does not fulfil all elements of relevant policy. However, the Council considers this matter is something that can be dealt with at the planning application stage through the normal Development Management process which will require the use of judgement as part of the assessment of proposals on their individual merits taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0049	Colin O'Callaghan	DM 4	O'Callaghan Planning considers the policy is too overlapped with Permitted Development rights and overly onerous in that it does not provide sufficient flexibility for new agricultural development on a farm or outlier farm holding with no existing farm buildings. In addition, indicates that since the policy makes allowances for farm businesses that are a minimum of 12 months old, there ought to be a recognition that at least some of these infant businesses will not have established groups of buildings to cluster new development with. As with development on outlier farms, considers this should be provided for in the policy where a new agricultural building is considered reasonable necessary and there is no effect upon rural character or residential amenity.	Policy should be less onerous when it comes to farm buildings away from existing farm buildings. Modifications should allow for new farm buildings away from existing buildings, on a case-by-case basis, and exceptionality (sic) ought not to be mandatory. The Policy should be directed specifically at situations that do not qualify as Permitted Development.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council recognises that exceptional circumstances may exist in particular cases where a proposal does not fulfil all elements of relevant policy. However, the Council considers this matter is something that can be dealt with at planning application stage through the normal Development Management process which will require the use of judgement as part of the assessment of proposals on their individual merits taking account of the policy provisions of the DPS, relevant guidance and other material considerations.

LA03/DPS/0050	Mr Lindsay Martin (O'Callaghan Planning)	DM 1	With regard to limiting acceptable uses at Nutts Corner, as outlined in Policy DM 1.1, Mr Lindsay Martin considers there is a potential that this will be applied rigidly, without any scope for flexibility. Considers provision should be made for appropriate complementary uses based on individual merit e.g. limited service/business facilities that meet the needs of the Strategic Employment Location.	Introduction of some form of caveat into policy that would provide for appropriate complementary / service uses.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". It is considered that small scale ancillary development /complementary uses can be considered on their individual merits through the normal Development Management process. Nutts Corner is already home to a number of large-scale businesses that are focused on storage and distribution, which require accessible and central locations. Transport and Logistics are identified in the Council's Economic Strategy as a major employer within the Borough and contributor to the local economy. As such Nutts Corner has been identified as a Strategic Employment Location which uses limited to industrial development, transport and logistics and storage and distribution proposals. B1 Office Uses are directed towards more accessible and sustainable locations including settlements which are identified in the Council's Spatial Growth Strategy as the key locations for economic growth and to BIA in order to strengthen its role as a Regional Gateway. The DPS's evidence base for Strategic Employment Locations is set out in Evidence Paper 3: Economic Growth. This document should be read for further information.
LA03/DPS/0051	Belfast City Council	Strategic Objectives	BCC welcomes Strategic Objective 1 and 6.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	SP 2	BCC are concerned that the elevation of Abbey Centre to a 'Large Town Centre' will have implications for retailing in the Belfast area (Addendum to their Rep also refers). Specifically, BCC requests for more information to be provided on how the process of increasing the supporting range of community functions over time will be realised, and whether this Plan should make this an aspiration, with the detail picked up in the Local Policies Plan or Strategic Planning Guidance.	Greater detail over the means of facilitating the supporting range of community facilities at Abbey Centre, Newtownabbey.	The Council considers the designation as drafted to be appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Evidence Paper 4: Retail and Commercial Leisure Study identifies a community facility within the centre at Figure 6.2 on page 99 of the Study. The Council has brought forward policy at the DPS stage to support further community facilities in line with the role and function of a town centre. SP 2.12 (b) specifically states that the Borough's town centres will be the preferred location for a number of uses including community facilities. The Council has also proposed a minor change to Policy DM 6 to reinforce and clarify that complementary uses includes community facilities. Therefore the application of the policy through the DM process will be the main mechanism to support the provision of community facilities at the centre. The Council will continue to engage with all stakeholders in the preparation of the LPP stage and will identify any lands required to deliver any specific community needs identified.
LA03/DPS/0051	Belfast City Council	SP 2	BCC considers that a managed masterplan approach or development framework is necessary to secure the objective for the transition of a more traditional town centre function, including but limiting to a greater diversity of uses, accessibility, transport, parking management and longer term sustainability appropriate to the designation and role as a Tier 1 centre.	Request that consideration is given to a managed masterplan approach or development framework to secure the objective for the transition of Abbey Centre to Tier 1 centre.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0051	Belfast City Council	SP 3	BCC supports the promotion of sustainable transport links with improving access to and from the surrounding towns.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	SP 3	BCC welcomes the approach to promote sustainable transport and raises the issue of establishing a rail link to Belfast International Airport.	No specified modification.	Support noted and welcomed. The Council will continue to work with its statutory partners and DfI Transport with regard to the viability of future transportation schemes (including cross boundary issues) as transport plans and local policies plan progress.
LA03/DPS/0051	Belfast City Council	SP 3	BCC have expressed support for the Council's approach to identify and facilitate development of community gateways throughout the borough and beyond.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	DM 12	BCC welcomes the Council's approach to promote measures in the design and layout of developments which support increased walking and cycling.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	DM 13	BCC have expressed support for the Council's approach to identify and facilitate development of community gateways throughout the borough and beyond.	No specified modification.	Support noted and welcomed.

LA03/DPS/0051	Belfast City Council	DM 13	BCC supports the Council's approach to operational development as outlined in Policy DM 13.	No specified modification	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	SP 4	BCC notes the identification of 9,750 units housing growth figure and the acknowledges the excess of committed housing supply across the Borough.	No specified modification.	Noted.
LA03/DPS/0051	Belfast City Council	SP 4	BCC welcomes the Council's intention to allocate 68% of proposed housing growth to Metropolitan Newtownabbey and Antrim.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	SP 4	BCC welcomes the objective to provide affordable housing in line with the need identified by NIHE and the intention to develop affordable housing supplementary planning guidance.	BCC would welcome the opportunity to collaborate with the Council regarding the consideration and publication of supplementary planning guidance.	Support noted and welcomed. The Council has now published Topic Paper 2: Affordable Housing which clarifies its position on affordable housing. This document should be read for further information. The Council will consider stakeholder engagement when preparing supplementary guidance.
LA03/DPS/0051	Belfast City Council	DM 17	BCC considers the proposed approach to accessible housing provisions differs from BCC in terms of the thresholds applied. Considers meeting Lifetime Homes standards does not automatically facilitate wheelchair accessibility.	No specified modification	Noted.
LA03/DPS/0051	Belfast City Council	DM 18, 18A, 18B, 18C, 18D, 18E, 18F, 18G	BCC welcomes the Council's policy approach to housing in the countryside which is considered consistent with the SPPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	DM 19	BCC welcomes the Council's policy approach to residential caravans and mobile homes which is considered consistent with the SPPS.	No specified modification	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	SP 5	BCC welcomes the Plan's flexible approach to cemetery and crematoria provision in the context of their cross-boundary significance and the BCC's ongoing need to explore options (beyond their administrative boundary) to address the requirement to serve the needs of residents.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	DM 23	BCC considers the Council's policy approach to the protection of open space is in line with regional policy and the approach set out in the Belfast's DPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	DM 24	BCC notes the Council's policy approach that decisions will be made in line with regional policy to ensure appropriate consideration of any wider regional requirements when making decisions on trans-boundary public utility matters.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	SP 6	BCC notes the positive approach of Policy SP 6.	No specified modification.	Support noted and welcomed.

LA03/DPS/0051	Belfast City Council	SP 6	BCC welcomes Policy DM 25, however is concerned that this would represent the full extent of any future Placemaking and Design Supplementary Planning Guidance. BCC notes the clear reference between the amplification text and the various strands of Policy DM 25.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS . The rationale for the policy is provided in the text "Why we have this Policy". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on Page 11 and Para. 1.5. SP 6.3, DM 25.2, DM 27.6, DM 29.3 and para.9.39 refer to supplementary guidance for placemaking and design. The Council will bring forward its own supplementary guidance for the LDP in due course and consider the need for any KSRs at the LPP stage.
LA03/DPS/0051	Belfast City Council	SP 8	BCC considers the Council's approach to Policy SP 8 policies is in line with the SPPS. The protection of important cross boundary assets such as Belfast Lough is welcomed and this matter should be considered in liaison with adjoining authorities to inform the detail designation stage (LPP).	No specified modification.	Cross boundary support noted and welcomed. The Council will continue to work with BCC and its statutory partners on LDP matters through the various available platforms and groups such as the Belfast Metropolitan Area Spatial Working Group and DAERA/DfI Coastal Forum to discuss LDP-related issues of mutual concern. Due to the site specific nature of this issue, this is a matter to be dealt with at the Local Policies Plan stage which will consider site specific designations/boundaries and the zoning of land.
LA03/DPS/0051	Belfast City Council	DM 37	BCC considers the Council's approach to Policy DM 37 is consistent with the SPPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	DM 38	BCC considers the Council's approach to Policy DM 38 is consistent with the SPPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	DM 39	BCC considers the Council's approach to Policy DM 39 is consistent with the SPPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	DM 40	BCC welcomes the Council's approach to protect important upland hills and mountains for their landmark qualities, their setting and cultural/historical qualities. Recognition of the Belfast Escarpment and adjacent landscapes in neighbouring councils (including BCC) is welcomed. BCC indicates that the importance of including views in and out of the area have been considered (Policy DM 40.1B). BCC welcomes the recognition of the need to protect landscape qualities and nature conservation attributes of the coastal area of Belfast Lough by protecting the urbanised coastal setting and enhancing the natural environment.	No specified modification.	Support noted and welcomed. Due to the site specific nature of this issue, this is a matter to be dealt with at the Local Policies Plan stage which will consider site specific designations/boundaries and the zoning of land.
LA03/DPS/0051	Belfast City Council	DM 41	BCC supports the need to protect the undeveloped coast from inappropriate development. Considers this matter also has potential cross boundary implications which will continue to be considered throughout the engagement with adjoining authorities as the plan progresses to LPP.	No specified modification.	Support noted and welcomed. As stated in Policy DM 41, our Borough does not have any 'undeveloped coast'. However, the Council will continue to engage with adjoining authorities on coastal issues of mutual concern through the LDP process and the (3) DAERA-DfI Coastal Forum groups.
LA03/DPS/0051	Belfast City Council	DM 42	BCC welcomes Policy DM 42.	No specified modification.	Support noted and welcomed.
LA03/DPS/0051	Belfast City Council	SP 10	BCC supports the Council's approach to Policy SP 10. Noted cross boundary working welcomed and encouraged as each Plan progresses, deemed the Plan does not conflict with BCC's LDP approach.	No specified modification.	The Council welcomes cross boundary support from BCC.

LA03/DPS/0051	Belfast City Council	DM 46	General support from BCC for the Council's approach to Policy DM 46: The Control of Development in Flood Plains.	No specified modification.	The Council welcomes cross boundary support from BCC.
LA03/DPS/0051	Belfast City Council	DM 47	General support from BCC for the Council's approach to Policy DM 47: Surface Water Drainage and Sustainable Drainage Systems.	No specified modification.	The Council welcomes cross boundary support from BCC.
LA03/DPS/0051	Belfast City Council	DM 49	General support from BCC for the Council's approach to Policy 49: Artificial Modification of Watercourses.	No specified modification.	The Council welcomes cross boundary support from BCC.
LA03/DPS/0051	Belfast City Council	DM 50	General support from BCC for the Councils approach to Policy 50: Pollution.	No specified modification.	The Council welcomes cross boundary support from BCC.
LA03/DPS/0051	Belfast City Council	DM 51	General support from BCC for the Council's approach to Policy DM 51: Major Hazards.	No specified modification.	The Council welcomes cross boundary support from BCC.
LA03/DPS/0051	Belfast City Council	DM 52	General support from BCC for the Council's approach to Policy 52: Contaminated Lands.	No specified modification.	The Council welcomes cross boundary support from BCC.
LA03/DPS/0051	Belfast City Council	Evidence Paper 6: Housing	BCC acknowledges the level of total estimated housing supply, which is well in excess of the Housing Growth Figure and notes the BCC position to use neighbouring authority lands to meet its housing need.	No specified modification	Noted. These comments do not impact on the soundness of the DPS. The Council will update its evidence base at the LLP stage when zoning sites for housing. The Council has now published Topic Paper 1: Housing Growth which further clarifies its position on Housing Growth. This document should be read for further information.
LA03/DPS/0051	Belfast City Council	Whole Plan	BCC considers the Council's strategic approach and draft plan policies identified do not conflict with the approach already set out in Belfast's draft Plan Strategy.	No specified modification.	Support noted and welcomed.
LA03/DPS/0052	Conway Group	SP 4	The Conway Group notes that the proposed housing growth figure of 9,750 units in the DPS is considerably lower than that proposed in the POP preferred option. Considers that this growth rate will not meet the housing needs of the Borough. Also considers that additional housing growth is required to help meet the ambitious economic growth plans of neighbouring Belfast City Council. Considers that such an approach is necessary to meet statutory requirements of the Planning Act 2011 and is also consistent with the RDS and SPPS. Considers that additional housing growth is clearly necessary, along with additional allocations to commuter settlements which serve Belfast.	The housing growth figure for the Borough should be increased.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. Whilst reliance for an uplift in the Borough's housing growth figure in this representation is made on the need for the Plan to accommodate the economic growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.

LA03/DPS/0052	Conway Group	SP 4	<p>The Conway Group considers that the proposed housing growth allocation of 150 dwellings for 29 hamlets, which is a reduction over the POP figures, will result in a significant shortfall of new dwellings within the hamlets.</p> <p>Considers that housing growth will be limited to 5 dwellings per hamlet over the Plan period, which will make it difficult for hamlets to maintain their population.</p> <p>Considers that there is a clear shortfall in the amount of dwellings required for Moneyglass.</p>	No specified modification.	<p>No change required. It is considered that the 150 unit housing allocation proposed for hamlets is reasonable and appropriate in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework, the DFI response to the POP and the role and function of hamlets. It is considered that an increase in the overall housing allocation to hamlets would be at odds with the considerations identified above.</p> <p>The DPS's evidence base for the housing allocation to Moneyglass is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0052	Conway Group	Site Specific	The Conway Group's representation includes a review of undeveloped housing sites in Moneyglass and considers that only one is available to sustain growth over the plan period. Housing on this site has already been approved and commenced, however the representation questions the deliverability of the site, as there is no intention to develop the land in the short to medium term.	Considers that to ensure a sustainable level of growth, adequate sites for housing must be provided in Moneyglass.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic assessment of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing, for the purposes of informing the draft Plan Strategy and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0052	Conway Group	Site Specific	The Conway Group requests subject lands be considered for housing development: Moneyglass.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0053	Heron Bros (Turley Planning)	SP 2	Heron Bros welcomes the identification of Nutts Corner as a Strategic Employment Location.	No specified modification.	Support noted and welcomed.
LA03/DPS/0053	Heron Bros (Turley Planning)	DM 1	Heron Bros are reassured by the inclusion of Policies DM 1, DM 1.1, DM 1.2, which reinforce the designation of Nutts Corner as a Strategic Employment Location.	No specified modification.	Support noted and welcomed.
LA03/DPS/0053	Heron Bros (Turley Planning)	DM 1	Heron Bros considers that consideration should be given to identifying all Class B uses as being suitable for locating within the proposed SEL at Nutts Corner.	No specified modification.	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is contained within the text "Why we have this Policy".</p> <p>It is considered that acceptable uses at the Nutts Corner Strategic Employment Location should be limited to industrial development, transport and logistics.</p> <p>The DPS's evidence base for Economic Growth is set out in Evidence Paper 3: Economic Growth. This document should be read for further information.</p>
LA03/DPS/0053	Heron Bros (Turley Planning)	DM 43	Heron Bros considers the Council should consider the inclusion of a planning policy which supports the sympathetic redevelopment of redundant quarry sites and land fill development for mixed use development.	Inclusion of policy supporting the redevelopment of redundant quarry sites for mixed use.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The Council considers that the assessment of proposals for the development of redundant quarry sites and land fill development for mixed use development is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS (Policies SP 1.1-1.3), relevant guidance and other material considerations.</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.</p>
LA03/DPS/0053	Heron Bros (Turley Planning)	Evidence Paper 3: Economic Growth	Heron Bros strongly supports the analysis in Section 11, Evidence Paper 3, which provides the rationale for designating a SEL at Nutts Corner.	No specified modification.	Support noted and welcomed.

LA03/DPS/0053	Heron Bros (Turley Planning)	Site Specific	Whilst accepting the strategic nature of the DPS, Heron Bros considers it would have been useful if the boundaries of the proposed SEL's had been identified by the Council within the Plan.	To designate SEL boundaries within the DPS.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider site specific designations and zonings.
LA03/DPS/0054	Clanmil Housing Group (Turley Planning)	Plan Vision	Clanmil Housing Group support the ambition and drive of the Plan's Vision for the Borough.	No specified modification.	Support noted and welcomed.
LA03/DPS/0054	Clanmil Housing Group (Turley Planning)	SP 4	Clanmil Housing Group considers that the proposed level of housing growth is unrealistic as it has not been informed by robust evidence. A robust evidence base should be prepared (including the preparation of a Housing Market Area assessment and a robust urban capacity analysis) to support the policy with consideration given as to whether the housing objectives can be met within the proposed allocation of 9,750 units.	No specified modification.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0054	Clanmil Housing Group (Turley Planning)	SP 4	Clanmil Housing Group fully supports the introduction of the policy to deliver affordable housing via two mechanisms, threshold based policy approach and zoning land specifically for affordable housing. Preference is that social housing need would be as part of a wider mixed tenure development.	No specified modification.	Support noted and welcomed. The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.
LA03/DPS/0054	Clanmil Housing Group (Turley Planning)	DM 17	Clanmil Housing Group suggests that the policy is incoherent and the subtle but important distinction between social rented and intermediate housing is not clearly set out. Can find no evidence or rationale to support the threshold requirement and whether alternative thresholds were considered. Concern that policy applies irrespective of need and developers may deliver full quota of affordable housing as intermediate housing. Welcome comments regarding issue of use of Section 76 agreements to secure affordable housing and the intention to bring forward supplementary planning guidance.	Strongly urge Council to include a definition within the policy amplification to avoid confusion and acknowledge that the definition may be subject to change. The policy should be redrafted and supported by robust evidence to underpin proposed thresholds. Reword policy to reflect that new developments in areas of identified social housing need, must address this aspect first.	No change required. The Council considers that the policy is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the Policy is provided by the text "Why we have this Policy". In order to provide for certainty for all parties, the policy should be applied consistently, with the expectation that all proposals of 40 units or greater will be required to deliver affordable units. It is recognised from the NIHE Housing Needs Assessment that there is an affordable housing need across the entire Borough. If Policy DM 17.3 was only to be applied to those settlements or geographical locations where a need has been identified, this could significantly undermine the potential of the policy to meet the overall needs of the Borough. While the Draft Plan Strategy does not make specific reference to a definition of Affordable Housing, the SPPS as well as Evidence Paper 6 para. 6.3 identifies that affordable housing is defined as social rented housing and intermediate housing for eligible households. The Council considers that given the current review of the definition of Affordable Housing it would prove difficult to identify a definition in the DPS. The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.
LA03/DPS/0054	Clanmil Housing Group (Turley Planning)	Site Specific	Clanmil Housing Group is unaware of any assessment undertaken to determine whether zoned sites and/or windfall sites are suitable, available or viable for residential development. Concerns over wording of para 7.14. Concern over the impact of a reduced or limited supply on Social Housing Development Programme. Urges Council to keep an open mind as to whether new lands are required as this can only be answered following a complete and robust analysis.	No specified modification.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and further updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0054	Clanmil Housing Group (Turley)	Miscellaneous	Clanmil Housing Group refers to the Planning Act (Northern Ireland) 2011. Considers the latest version of the Council's LDP timetable dated July 2018 cites the publication of DPS in Q4 2018/2019. In practice, the DPS was published in Q2 2019/2020 4 months after the agreed date set out in the timetable.	No specified modification.	Noted. The DPS was published in Q1 2019-2020. DfI advised all Councils that three months either side of the published date of a Timetable was acceptable. The Council met this target and will continue to keep the LDP Timetable under review. A new LDP Timetable was published in October 2020.

LA03/DPS/0054	Clanmil Housing Group (Turley)	Miscellaneous	<p>Clanmil Housing Group refers to the Council's statement, "Such documents as in the opinion of the Council are relevant to the preparation of the LDP". Considers the Council should have included supporting evidence to inform draft policy.</p> <p>Considers there is a gap in the information base and therefore the Plan has failed to address procedural test 4. Also considers there are gaps in the evidence base used to formulate the figure. Principally that there is statistical data together with the findings of housing market and urban capacity assessments which require closer analysis to inform the overall level of housing within the Borough.</p>	No specified modification.	<p>Noted. No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough. the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0055	NewRiver REIT UK Ltd (One2One Planning)	Strategic Objectives	NewRiver REIT UK Ltd. consider that Strategic Objective 4 is consistent with the SPPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0055	NewRiver REIT UK Ltd (One2One Planning)	SP 2	NewRiver REIT UK Ltd. support the recognition of the Abbey Centre as a Large Town in the Plan's proposed Retail Hierarchy (table 4).	No specified modification.	Support noted and welcomed.
LA03/DPS/0055	NewRiver REIT UK Ltd (One2One Planning)	DM 6	<p>NewRiver REIT UK Ltd consider that the role of town centres is changing beyond just retail and considers them as important hubs for a range of land uses and activities.</p> <p>NewRiver REIT UK Ltd considers Policy DM 6.2 conflicts with Policy DM 6.1 as, instead of promoting diversity of use, it seeks to retain units as retail use across all tiers of centres.</p> <p>Considers the policy requirement for an applicant to evidence that despite marketing of a retail unit/building for at least 12 months there has been no interest shown, as excessive. Considers this policy approach is inflexible and could be detrimental to the vitality and viability of a centre.</p> <p>Notes that the Council's policy approach makes no provision for temporary or meanwhile uses in vacant units last used as retail.</p>	Policy 6.2 to be reworded: "Proposals that would result in the loss of retail units will only be permitted where it is demonstrated that the proposal will not harm the vitality and viability of the centre or its environmental quality".	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council notes the concerns raised in the representation specifically regarding the length of time a retailer is expected to market a retail unit/building. However, the provisions of the policy are not unduly onerous and the Council considers that their application through the normal Development Management process will help ensure that all proposals, including retail and town centre uses, will promote the positive role, and help sustain the vitality of the Borough's centres.</p> <p>The Council will support innovative temporary or meanwhile uses through permitted development where the proposal contributes positively to the character and early activation of an area. Such uses must not prevent development sites from being brought forward for development in a timely fashion.</p>
LA03/DPS/0055	NewRiver REIT UK Ltd (One2One Planning)	DM 6	<p>NewRiver REIT UK Ltd have expressed concern that the policy provisions of Policy DM 6.1 requires applicants of proposals in centres to demonstrate three things which they currently don't have to within the policy provisions of the SPPS.</p> <p>NewRiver REIT UK Ltd considers that proving a contribution to vitality and viability is unnecessary in a town centre and it is unclear how this can be demonstrated. Meeting local needs is inappropriate in larger centres. There is no information on how footfall impact is to be measured, and footfall counts will provide an unnecessary financial burden on applicants.</p>	<p>Re-word Policy 6.1 as follows:</p> <p>"The Council will encourage and support a diverse range of retail and complementary uses within our Borough Centres.</p> <p>All proposals should support the effective functioning of the centre and maintain and enhance the visual amenity of the area by providing an active and attractive frontage appropriate to the location".</p>	<p>Open to minor change.</p> <p>Overall the Council considers the broad thrust of Policy DM 6 as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The provisions of the policy as drafted are not considered unduly onerous and their application through the normal Development Management process is intended to help ensure that all proposals, including retail schemes, will promote the positive role and help sustain the vitality and viability of the Borough's centres. Nevertheless, the Council notes the concern raised in this and other representations regarding its application in relation to retail proposals in a town centre and is open to a number of minor textual changes to make the policy intent clear.</p> <p>The Council is suggesting the following minor textual changes in response to the representations for the purposes of clarification in relation to the application of Policy DM 6. The suggested change involves dropping 6.1 (c) and recasting the remaining text. The suggested text simply clarifies the policy intent and does not introduce a new policy concept as the original text in DM 6.1 (a) and (b) covered these points. Furthermore, the Council is content that the deletion of 6.1 (c) does not diminish the policy intent. It is clear when the DPS and its evidence base are read together that the DPS seeks to recognise and promote the Borough's town, district and local centres as the most appropriate location for retail development and other employment, leisure and cultural uses and this remains the case with the minor changes suggested.</p> <p>Suggested minor change DM 6.1(a) – (c), page 98 to "DM 6.1: The Council local needs. All development proposals should contribute positively to the vitality and viability of the centre, and will be required to demonstrate that they will maintain or enhance the visual amenity of the area by providing an active and attractive frontage appropriate to the location."</p>

LA03/DPS/0056	Andrew McCracken (Transport Training Board for NI - TTBNi)	SP 2	TTBNI supports the concept of designating Nutts Corner as a Strategic Employment Location. TTBNI considers Nutts Corner is already a Strategic Employment Location and is also a strategic location for training and development across the transportation and construction industries. TTBNI highlights that further growth will require planned development to the local infrastructure of the area.	No specified modification.	Support noted and welcomed. Nutts Corner is already home to a number of large-scale businesses that are focussed on storage and distribution which require accessible and central locations. Transport and Logistics are identified in the Council's Economic Strategy as a major employer within the Borough and contributor to the local economy. As such, Nutts Corner has been identified as a Strategic Employment Location with uses limited to industrial development, transport and logistics and storage and distribution proposals. B I office uses are directed to more accessible and sustainable locations including settlements which are identified in the Council's Spatial Growth Strategy as the key locations for economic growth. The DPS's evidence base for Strategic Employment Locations is set out in Evidence Paper 3: Economic Growth. This document should be read for further information.
LA03/DPS/0057	The Six Mile Water Trust (SMWT)	Plan Vision	SMWT indicates it is not too sure what the term "continue to be" means. If the Council is suggesting in the DPS that the Borough's built and natural environment are currently of high quality and well looked after, SMWT would therefore strongly disagree with this part of the Vision.	Suggests that at line 7, the words 'continue to be', be removed.	No change required. The Council considers the DPS Vision as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. Section 3 of the DPS sets out the context in which the vision was prepared. Paragraph 1.6 of the DPS clearly states, "The LDP is intended to provide a plan framework that will support the economic and social needs of our Borough up to 2030".
LA03/DPS/0057	The Six Mile Water Trust	Strategic Objectives	SMWT are very supportive of the strategic objectives for homes.	No specified modification.	Support noted and welcomed.
LA03/DPS/0057	The Six Mile Water Trust	Strategic Objectives	SMWT consider the Visionary Objectives as 'workman like' and lacking in real vision. SMWT consider this is a missed opportunity for the Council.	No specified modification.	No change required. The Council considers the DPS objectives as drafted is appropriate and reasonable and have taken account of the provisions of the RDS and SPPS. Section 3 of the DPS sets out the context in which objectives were prepared.
LA03/DPS/0057	The Six Mile Water Trust	Strategic Objectives	Strategic Objective 4 is strongly supported by SMWT. Strategic Objective 5 is a positive objective as long as sustainable focuses on environmental sustainability. Strategic Objective 6 is welcomed by SMWT. Strategic Objective 7, 8 and 10 is strongly supported by SMWT.	No specified modification.	Support noted and welcomed.
LA03/DPS/0057	The Six Mile Water Trust	Strategic Objectives	Whilst SMWT is supportive of Strategic Objective 11, they consider rivers and streams have been excluded. SMWT consider the wording used gives the impression that biodiversity does not exist in built up areas.	No specified modification.	Open to minor change. The Council is suggesting the following minor punctuation change in response to the representation for the purposes of clarification to emphasise the importance of biodiversity in the plan. The reference to biodiversity in Strategic Objective 11 is not intended to solely relate to open countryside and therefore the comma suggested will ensure clarification. The minor punctuation change does not introduce any new policy concept to the DPS. It is clear when the plan and its evidence base is read in totality that the Council has considered the role of biodiversity (e.g. SP1, SP6, SP8 etc.). The concept is already introduced in a range of legislation e.g. Wildlife and Natural Environment Act (Northern Ireland) 2011, The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) etc. as well as regional policy such as the RDS 2035 and SPPS. Suggested minor change at Strategic Objective 11, page 59, insertion of comma after biodiversity to read "biodiversity, and conserve."
LA03/DPS/0057	The Six Mile Water Trust	Strategic Objectives	SMWT consider that Strategic Objective 12 must include a specific reference to trees.	Wording should include trees.	No change required. The Council considers the objective as drafted is appropriate and reasonable and has taken account of the provisions of the SPPS and RDS. Section 3 of the DPS sets out the context in which objectives were prepared. Reference to 'Natural Resources' to include trees.
LA03/DPS/0057	The Six Mile Water Trust	Strategic Objectives	SMWT consider that Strategic Objective 13 should be positive as well as negative.	Include wilding opportunities and timber production.	No change required. The Council considers the objective as drafted is appropriate and reasonable and has taken account of the provisions of the SPPS and RDS. Section 3 of the DPS sets out the context in which objectives were prepared. The Council does not see the merit in including a negative Objective.

LA03/DPS/0057	The Six Mile Water Trust	Strategic Objectives	SMWT requests Strategic Objective 14 to include upcycling.	Include upcycling.	No change required. The Council considers the objective as drafted is appropriate and reasonable and has taken account of the provisions of the SPPS and RDS . Section 3 of the DPS sets out the context in which objectives were prepared.
LA03/DPS/0057	The Six Mile Water Trust	SP 1	SMWT consider that the policy wording needs to be clarified and strengthened to protect and enhance the river environment.	Policy SP 1.13 should read 'Developers will provide'.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council notes that if/ when introduced, development contributions can only be used for mechanisms within the Council's control. Paragraph 1.17 clearly demonstrates the Council's commitment to bring forward supplementary planning guidance as the Local Development Plan progresses.
LA03/DPS/0057	The Six Mile Water Trust	SP 2	SMWT supports the protection and development of town centres, rather than out-of-centre development, which is often located on valuable land.	No specified modification	Support noted and welcomed.
LA03/DPS/0057	The Six Mile Water Trust	SP 2	SMWT consider there are many opportunities for sustainable tourism along the Six Mile Valley, Lough Neagh is an outstanding opportunity, with the Council's new visitor centre being an important addition.	No specified modification	Noted.
LA03/DPS/0057	The Six Mile Water Trust	DM 4	SMWT are very disappointed that this part of the Plan is dealt with in such a cursory manner. SMWT consider it is unacceptable that farm buildings are erected with the minimum regard to appearance. Planners also need to put into place a requirement to protect the agricultural landscape especially the protection of river, streams , ditches, hedges, trees and woodlands.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that the majority of farm buildings are erected through the Permitted Development legislative process rather than through the normal Development Management process. Those buildings erected outside of the permitted development process will be subject to the policies contained within the DPS which should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.
LA03/DPS/0057	The Six Mile Water Trust	DM 4	SMWT considers unsustainable agricultural activities impact water quality and the environment.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Policy wording relates to agricultural 'development' rather than 'activities' which the Council considers are outwith the role of the LDP process.
LA03/DPS/0057	The Six Mile Water Trust	SP 3	SMWT are supportive of means of transport that minimise damage to the environment and therefore keen to see priority given to walking and cycling. However, to make these modes of transport effective there must be better connectivity and advance planning. SMWT are encouraged the Plan considers the reuse of former railway lines.	No specified modification.	Support noted and welcomed.
LA03/DPS/0057	The Six Mile Water Trust	DM 12	SMWT consider Policy DM 12 as helpful, whilst noting the lack of basic footpaths and cycle routes across the Borough and in particular, within Doagh village.	No specified modification.	Support noted and welcomed.
LA03/DPS/0057	The Six Mile Water Trust	DM 15	Main sewage is strongly supported by SMWT, who consider it is important that there is adequate and high quality infrastructure in place. Unacceptable that there are still overflows of sewage into rivers and the sea. Separation measures must be part and parcel of all developments and infrastructure brought up to the necessary standard to ensure a holistic approach to preventing sewage entering rivers, streams, loughs and sea. Concerns raised regarding underinvestment in waste water treatment plants and consider it is important for the Plan to state that development cannot take place where waste treatment plants cannot cope.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council will continue to engage with its statutory partners with regard to WwTW capacity issues. Development and WwTW capacity issues will be considered through the normal Development Management process. The DPS's evidence base for WwTW is set out in Evidence Paper 11: Public Utilities. This should be read for further information ('Waste Water', para 10.15, pg. 49).

LA03/DPS/0057	The Six Mile Water Trust	DM 17	Whilst SMWT welcomes the provision of open space standards for homes, they consider there is a current under provision across the Borough. Consider it is critical that open space integrates to form wildlife corridors and is part of connectivity arrangements with appropriate links to transportation and walkways etc. Links to rivers and streams need to be put in place and open ditches allowed to remain rather than be piped.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council advises that planning policy contained within the DPS must be read in its entirety. All policies within the LDP should be read together. This made clear in Policy SP 1, Positive Planning Note page 11 and para 1.5.
LA03/DPS/0057	The Six Mile Water Trust	Strategic Objectives	SMWT are very supportive of the three (rep states 3 but there are actually 4) strategic objectives for SP 5.	No specified modification.	Support noted and welcomed.
LA03/DPS/0057	The Six Mile Water Trust	DM 23	Whilst SMWT are supportive of Policy DM 23, it is not supportive of the possible justifications for development. SMWT requests the policy includes a reference to trees and woodlands and their importance in terms of climate change, improving the environment and public health.	Whilst no specific modification is indicated, include reference to trees and woodlands and their importance in terms of climate change and their help in improving the environment and people's health.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". In addition, it should be noted that the DPS includes policy provision for responding to climate change in Policy SP 10 Environmental Resilience and Protection, and trees and development in Policy SP 8 Natural Heritage, in particular Policy DM 42 Trees and Woodland.
LA03/DPS/0057	The Six Mile Water Trust	SP 6	SMWT state that the objectives of Policy SP 6 are excellent.	No specified modification	Support noted and welcomed.
LA03/DPS/0057	The Six Mile Water Trust	SP 6	SMWT make a general comment regarding design considerations relating to historic planning decisions in the Borough and its impact on the wider environment.	No specified modification.	Noted. The Council considers this issue relates to historical planning decisions in the Borough and is therefore outwith the DPS process.
LA03/DPS/0057	The Six Mile Water Trust	DM 25	SMWT are very supportive of Policy DM 25 and feel very strongly that rivers provide one of the most important places for movement and connectivity.	No specific modification, however SMWT request for river corridors to be considered in terms of movement and connectivity.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".
LA03/DPS/0057	The Six Mile Water Trust	DM 26	SMWT consider shop fronts is one area that the Council's vision, which is tied closely to nature, does not express well. SMWT recognises the plethora of plastic signage in the Borough. SMWT would ask that the Council take planning measures to reduce the use of plastics for this purpose.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Policy DM 29(c) advises that an advertisement should be sympathetic to its location in terms of the style of sign and finishes to be used. This is a matter that falls for determination within the normal Development Management process.
LA03/DPS/0057	The Six Mile Water Trust	SP 7	SMWT is supportive of the objectives and policies for the Historic Environment.	No specified modification.	Support noted and welcomed.
LA03/DPS/0057	The Six Mile Water Trust	SP 7	SMWT considers the DPS does not highlight the combination of the built and natural environment of the Six Mile valley. Every effort should be made to protect the remains of the Six Mile valley industrial heritage and enable its restoration. Considers the Six Mile Valley has potential to become an outstanding area of inhabitants and visitors.	No specified modification.	No change required. The Council considers that the policy as a drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers that the current policies as set out in the Historic Environment and Natural Heritage sections of the DPS will effectively protect those elements of the Six Mile Water Valley identified in the representation.

LA03/DPS/0057	The Six Mile Water Trust	SP 8	<p>SMWT is supportive of Policy SP 8 Natural Heritage.</p> <p>However, the Trust considers that various proposals are not sufficiently objective and there is little expression of making improvements and enhancing protection of natural assets.</p> <p>The Trust finds it odd that there is no mention of the aquatic environment and is disappointed that the Six Mile Water Valley and rivers such as the Maine and Crumlin river do not receive any mention which is a major omission.</p>	<p>No specific modification but requests that the Six Mile Valley, the natural and historic environment be considered as a single entity.</p>	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council considers aquatic environments includes inland surface waters, seas and ground water. Fig 12 on page 240 of the DPS clearly sets out the Natural Heritage Assets within the Borough, to include Large Rivers, the Coastal Area, and Belfast Lough, Lough Neagh and Lough Beg. In addition, para 11.9 (page 239) of the DPS sign posts the reader to aquatic environments as defined by DAERA on their website.</p> <p>The Council considers that there is no need for the cross-referencing suggested, as all policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.</p>
LA03/DPS/0057	The Six Mile Water Trust	SP 8	<p>SMWT considers that as a minimum, the Six Mile Valley must be made a Strategic Landscape Policy Area.</p>	<p>No specified modification.</p>	<p>No change required. The Council considers the list of Strategic Landscape Policy Areas as identified is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>Evidence Papers 16, 17, 18, 19 and 20 set out information in relation to the Natural Heritage assets across the Borough and the rationale for the identification of the Strategic Landscape Policy Areas included within the DPS.</p>
LA03/DPS/0057	The Six Mile Water Trust	SP 8	<p>Whilst SMWT is supportive of Policy SP 8.7, considers the Plan's mention of 'river banks' is inadequate. The Association feels very strongly that river buffer strips and corridors be provided. Paragraph (e) is inadequate and needs to include individual trees.</p>	<p>SP 8.7 paragraph (e) needs to include individual trees.</p>	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>As stated in Policy SP 8.8 the designation of Local Landscape Policy Areas will be brought forward through the Local Policies Plan and will include those features which the Council considers appropriate for protection as directed by the SPPS.</p>
LA03/DPS/0057	The Six Mile Water Trust	DM 40	<p>SMWT notes and supports the inclusion of Carnmoney Hill as a Strategic Landscape Policy Area.</p>	<p>No specified modification.</p>	<p>Support noted and welcomed.</p>
LA03/DPS/0057	The Six Mile Water Trust	DM 42	<p>SMWT considers Policy DM 42.1 is positive and welcomes the inclusion of hedgerows especially those that are native and which are of immense value for various reasons.</p>	<p>No specified modification.</p>	<p>Support noted and welcomed.</p>
LA03/DPS/0057	The Six Mile Water Trust	DM 42	<p>SMWT welcomes the reference to Trees and Development. However, the Trust identifies the Council's lack of an appropriate response to sites under threat and the apparent lack of any action to protect trees and woodlands outwith development sites.</p> <p>Considers there are too many hedgerows and trees removed at development sites and developers must be required to provide replacement trees that are fit for purpose.</p> <p>Trees in around development areas are under immense threat and the Trust is of the view that such trees must be protected by TPO's and the need to have an appropriate amenity tree valuation system in place.</p> <p>The comment of a net gain in numbers of trees is seriously flawed. To protect 'potentially vulnerable trees' is a wholly inappropriate approach. If the trees are valuable they should be protected.</p>	<p>No specified modification.</p>	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that the policy provisions of Policy DM 42 will assist in protecting existing trees, as well as leading to the planting of new trees, in assessing development proposals across the Borough.</p> <p>The protection of trees through Tree Preservation Orders, must be made in accordance with the relevant legislative provisions.</p>
LA03/DPS/0057	The Six Mile Water Trust	DM 45	<p>SMWT is generally supportive of the policy approach. However, concern is expressed regarding river based hydro's and their potential impact on local wildlife.</p>	<p>No specified modification however reference should be made in the Plan to the protection of water based migratory fish and other wildlife.</p>	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers the additional policy wording is not required as all policies within the Plan should be read together and any such proposals with potential to impact on the river environment will be considered through the normal Development Management process which will consider the LDP policies and other material planning considerations.</p>

LA03/DPS/0057	The Six Mile Water Trust	SP 10	SMWT have requested for Rivers and Streams to be included in the list at 13.9 Environmental Protection.	Policy wording to be included re: Rivers and Streams	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS . The rationale for the strategic policy is provided in the text "Why we have taken this approach".
LA03/DPS/0057	The Six Mile Water Trust	DM 46	SMWT have expressed concern regarding the redevelopment of flood plains. Flood plains need to be seen as major asset not just for helping to alleviate flooding downstream but also as a mechanism to protect rivers. Flood plains are of enormous value for creating specialist habitats for many forms of wildlife.	The Plan should promote and legislate for the benefits of sustainable drainage for all developments.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Furthermore, the Council considers that Policy DM 47 clearly promotes a sustainable approach to drainage and flood risk management.
LA03/DPS/0057	The Six Mile Water Trust	DM 52	SMWT have expressed general support for policy provisions, in particular reference to potential damage to the environment and human health. Council to ensure the investigation mechanism is fully professional and robust in nature.	No specified modification.	Support noted and welcomed.
LA03/DPS/0057	The Six Mile Water Trust	DM 47	SMWT have expressed concern regarding additional surface water generated through various forms of development. SMWT have expressed support for the Council's approach subject to additional wording.	Policy to consider the following additions with regard to surface level water (1) Slow drainage driveways in housing developments and other forms of sustainable development (2) Other natural forms of storage of water such a reservoirs, ditches and dams to be retained and (3) A distinct preference of natural open and meandering ditches as opposed to concrete/plastic culverts and pipes is a key necessity and also wildlife benefit.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the suggested policy wording changes are not required, as the matters are adequately dealt with through the existing wording of Policies DM 47 and SP 10. See also suggested minor wording change to Policy DM 47.5.
LA03/DPS/0057	The Six Mile Water Trust	Miscellaneous	SMWT welcomes the Plan but wishes to emphasise that its lateness has contributed to many poor development decisions throughout the Borough.	No specified modification.	No change required. The DPS was published in Q1 2019-2020. DfI advised all Councils that three months either side of the published date of a Timetable was acceptable. The Council met this target and will continue to keep the LDP Timetable under review. A new timetable was published in October 2020.
LA03/DPS/0058	Maurice & Joy Parkinson	SP 1	Mr and Mrs Parkinson consider that planning decisions taken in recent years have resulted in poorly designed developments that are deficient in many ways. They consider that planning needs to be undertaken in a holistic manner where all material issues are considered in a collective manner with the aim of achieving quality in planning.	No specified modification.	Noted. The Council considers this issue relates to historical planning decisions in the Borough and is therefore outwith the DPS process. All policies within the DPS should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.
LA03/DPS/0058	Maurice & Joy Parkinson	SP 1	Mr and Mrs Parkinson consider the Council should have introduced developer contributions some time ago.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Policy SP 1.17 clearly states, "The Council intends to bring forward supplementary planning guidance to explain in greater detail how developer contributions will be implemented through the planning process and the scale of contributions likely to be required".
LA03/DPS/0058	Maurice & Joy Parkinson	SP 2	Mr and Mrs Parkinson note that there are areas of dereliction within existing centres, such as Abbey Centre and Antrim Town Centre, whilst alternative shopping provision has been permitted along roadways at the fringe of towns and villages. They note this is a UK wide issue and consider the recovery of town centres is not adequately dealt with within the plan. They suggest a blanket ban on out-of-centre shopping until this is studied in depth and new proposals brought forward.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy approach set out in SP 2 is provided in the text "Why we have taken this approach". Policy SP 2.12 of the DPS clearly states the Council will operate a town centre first approach in considering the development of retail and other main town centre uses across the Borough by applying the Retail Hierarchy as set out in table 4 (page 79 of the DPS). This is complemented by a number of DM Policies such as Policies DM 6 and 7. The Council do not see any merit in a blanket ban on all out-of-centre retail development across the Borough. Proposals will be considered on their individual merits through the normal Development Management process and taking account of the policies in the Local Development Plan. The DPS's evidence base for centres is set out in Evidence Paper 4: Retail and Commercial Leisure. This document should be read for further information.

LA03/DPS/0058	Maurice & Joy Parkinson	DM 4	Mr and Mrs Parkinson consider Policy DM 4 within the DPS dealing with farm buildings is disappointingly sparse. They consider existing agricultural buildings are generally of poor design and rarely fit into the landscape. The Parkinson's consider that the Plan needs to develop quality planning policies that must be adhered to by all farmers.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that the majority of farm buildings are erected through the Permitted Development legislative process rather than through the normal Development Management process. Those buildings erected outside of the permitted development process will be subject to the policies contained within the DPS which should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.
LA03/DPS/0058	Maurice & Joy Parkinson	SP 3	Mr and Mrs Parkinson welcome the Plan's proposals on connectivity, whilst noting the current lack of connectivity across the Borough including congestion, roads and access issues in and around Ballyrobert and Ballyclare.	No specified modification.	Support noted and welcomed.
LA03/DPS/0058	Maurice & Joy Parkinson	SP 3	Mr and Mrs Parkinson welcome the references to cycling in the DPS. They consider there is a need for a public modal shift away from the use of the private car to Active Travel means.	Additional policy wording to include: "By a certain date, every household in the Borough will have access to a cycle way no further way than 400m from their home".	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Given the rurality of some parts of the Borough, the proposed policy revision is unlikely to be achieved. However, the DPS actively supports the promotion of Active Travel, to include the promotion of cycling. In addition, the DfI Transport Study for the Borough (December 2020) sets out ways to promote increased walking and cycling across the Borough. As the Local Development Plan process progresses, the Council will continue to work with the Department and statutory partners to promote active travel across the Borough.
LA03/DPS/0058	Maurice & Joy Parkinson	DM 17	Mr and Mrs Parkinson welcome the DPS proposals for developers to provide public open space and consider it essential that this space is child orientated and useable. Important that developers are not allowed to opt out of this provision but for the Council to insist on quality in design and provision.	No specified modification.	Support noted and welcomed.
LA03/DPS/0058	Maurice & Joy Parkinson	SP 6	Mr and Mrs Parkinson consider the Plan could do more to highlight the importance of high quality and visually attractive areas which are environmentally sustainable.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". All policies in the Plan should be read together. This is made clear in Policy SP1, Positive Planning Note on page 11 and para. 1.5. It is clear when the Plan and all its evidence base is read together that the Council recognises the importance of those areas within the Borough that are of importance in terms of natural heritage assets and also open space provision. the Local Policies Plan will also have a role to play.
LA03/DPS/0058	Maurice & Joy Parkinson	DM 25	Mr and Mrs Parkinson raise concerns regarding design and layout issues with recent housing schemes in the Borough. Recommends planning needs to be undertaken in an holistic manner where all material issues are considered in a collective manner with the aim of achieving quality in planning. Suggests Planners and planning policy needs to have a sense of design quality and a liking for the natural environment.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council is committed to the promotion of good design and layout, and sustainable development. Policies SP 6 Placemaking and Good Design, DM 25 Urban Design and DM 26 Rural Design and Character demonstrates the Council's commitment to promoting good standards of design, layout and landscaping.
LA03/DPS/0058	Maurice & Joy Parkinson	SP 8	Mr and Mrs Parkinson note that the Plan makes no specific reference to the Six Mile Valley Park or to other specific rivers or loughs.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Planning policy relating to Natural Heritage and the Environment is clearly set out in Policy SP 8 Natural Heritage and Policy SP 10 Environmental Resilience and Protection. Large Rivers in the Borough are also mapped in Figure 12 (page 240) of the Plan and the river networks importance is stated in Para 2.76 (page 50).
LA03/DPS/0058	Maurice & Joy Parkinson	SP 8	Mr and Mrs Parkinson recommend that the Six Mile Valley Park be designated a Strategic Landscape Policy Area (landscape and tourism benefits noted).	Six Mile Valley Park to be designated a Strategic Landscape Policy Area.	No change required. The Council considers the list of Strategic Landscape Policy Areas as identified is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Evidence Papers 16, 17, 18, 19 and 20 set out information in relation to the Natural Heritage assets across the Borough and the rationale for the identification of the Strategic Landscape Policy Areas included within the DPS.
LA03/DPS/0058	Maurice & Joy Parkinson	DM 42	Mr and Mrs Parkinson welcome the Plan's policy approach to in relation to trees but considers they are not sufficiently robust enough. Considers policy should be amended to ensure that tree planting is carried out along with tree protection.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that the policy provisions of Policy DM 42 will assist in protecting existing trees, as well as leading to the planting of new trees, in assessing development proposals across the Borough. The protection of trees through Tree Preservation Orders, must be made in accordance with the relevant legislative provisions.

LA03/DPS/0058	Maurice & Joy Parkinson	SP 10	Mr and Mrs Parkinson make the general comment about litter and in particular, plastic waste. Recommends the Plan should incorporate a policy on how planning could help reduce the impact of litter/waste on the economy and the environment as a whole.	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>Strategic Objective 14 of the DPS states, to 'Ensure the responsible management of waste and support measures to increase recycling'.</p> <p>The Council's LDP has an important role to support the provision of waste facilities and infrastructure to deliver sustainable waste management. The Council is responsible for the management of municipal waste collection in the Borough.</p> <p>Evidence Paper 15: Waste, section 7 sets out the Council's approach to waste management in the Borough and informs the DPS with regards to Waste.</p>
LA03/DPS/0058	Maurice & Joy Parkinson	SP 10	Whilst Mr and Mrs Parkinson welcome the Plan responding to issues relating to the Environment and Climate, they consider the policy approach is not sufficiently creative or ambitious in nature.	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council's Local Development Plan process has taken an active and robust approach to Environmental and Climate issues in the Borough.</p> <p>The DPS Vision clearly states, 'Development will be sustainable and of high quality and will address the ongoing challenges of climate change'.</p> <p>Strategic Objective 12 of the DPS clearly states the Plan will 'Ensure the responsible use of land and natural resources and promote sustainable energy production to mitigate and adapt to climate change'.</p> <p>Numerous Strategic Policies and Development Management policies refer to climate change. The Council notes that no supporting information has been submitted as to how the Council can better respond to Environment and Climate issues within the LDP process.</p>
LA03/DPS/0058	Maurice & Joy Parkinson	DM 50	Mr and Mrs Parkinson make the general comment about the pollution of streams and waterways (with a specific reference to the Six Mile Water).	Additional policy wording to include a requirement for a Water Quality Impact Assessment to accompany 'all' planning applications and control re: commercial storage of chemicals and disposal of washings.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>Proposals will be considered on their individual merits through the Development Management process and taking account of the policies in the Local Development Plan.</p>
LA03/DPS/0059	Aberdeen Asset Management (TSA)	SP 2	<p>Aberdeen Asset Management supports the classification of the Abbey Centre in the proposed retail hierarchy as a Tier 1 Large Town Centre.</p> <p>The response advises that this support is based on the boundary for the Abbey Centre District Centre as indicated in BMAP 2015 being carried forward at LPP stage.</p>	No specified modification.	<p>Support noted and welcomed.</p> <p>Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations / boundaries and the zoning of land.</p>
LA03/DPS/0060	Belfast Hills Partnership (BHP)	DM 23	BHP welcomes the fact that the protection of open space applies to the Plan regardless of public access availability to it. BHP considers there are huge landscape, aesthetic, biodiversity and natural capital benefits of open space including those areas with no public access.	No specified modification.	Support noted and welcomed.
LA03/DPS/0060	Belfast Hills Partnership (BHP)	DM 23	BHP welcomes examples of open space in the Plan's Amplification section and requests that Local Nature Reserves be added to the list of examples of open space of public value.	Local Nature Reserves to be added to Para 8.20 - Amplification.	<p>No change required. The Council considers the policy amplification as drafted is appropriate and reasonable. Whilst the Council acknowledges the important function of Local Nature Reserves, including their value as an open space, it considers they are more appropriately recognised within the Natural Heritage section of the DPS.</p> <p>In addition, it should be noted that Local Nature Reserves are afforded policy protection by the DPS in Policies SP8 and DM 37.5.</p>
LA03/DPS/0060	Belfast Hills Partnership (BHP)	SP 8	BHP strongly believe that the designation of an Area of High Scenic Value (AHSV) should be retained in addition to the use of Landscape Character Areas.	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council recognises those areas in Borough exhibiting the greatest scenic quality and environmental value through the proposed designation of Strategic Landscape Policy Areas. which are afforded protection through Policy DM 40. Once adopted, the precise boundaries of these areas will be identified at the Local Policies Plan stage of the LDP process.</p>
LA03/DPS/0060	Belfast Hills Partnership (BHP)	DM 39	BHP welcome this protection, but believe that the word 'unacceptable' in Policy DM 39.1 is not used properly in this context. Suggests that the wording "unacceptable adverse impact" be replaced with 'major impact' would make more sense.	To amend policy word 'unacceptable' with ' <i>major impact</i> .'	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council would point out that the policy wording used is consistent with Paragraphs 6.192-6.193 of the SPPS.</p>
LA03/DPS/0060	Belfast Hills Partnership (BHP)	DM 39	<p>BHP welcomes the Council's acknowledgement of the importance of preventing habitat fragmentation in the Development Management process.</p> <p>Recognises that application through the planning process will only be as good as the information available to inform decisions.</p>	No specified modification.	<p>Support noted and welcomed.</p> <p>It should be noted that consideration of the impact of development on natural heritage will be taken forward through the normal Development Management process. This will generally entail consultation with the Northern Ireland Environment Agency.</p>

LA03/DPS/0060	Belfast Hills Partnership (BHP)	DM 40	BHP considers the criteria quoted within Policy DM 40.2, relating to the requirements for a visual impact assessment and landscape analysis, are very substantial, given that even smaller structures may have a significant landscape effect. BHP has requested that options to seek proportionate visual impact and landscape impact analysis are available to Planners for a second tier of areas and lower heights. Considers this could be at the Council's discretion through the formal assessment process.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". It should also be noted that the need for a proportionate visual impact and landscape assessment is already indicated in Policy DM 40.2 for Strategic and Local Landscape Policy Areas. In addition, the Council would not be precluded from seeking such an analysis for other developments through the normal Development Management process, where this is considered necessary to inform a particular decision.
LA03/DPS/0060	Belfast Hills Partnership (BHP)	DM 40	BHP welcomes the specific policy reference to Cammoney Hill and believe that it should be listed that developments must not have an adverse impact on the natural or historic environment of the site.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.
LA03/DPS/0060	Belfast Hills Partnership (BHP)	DM 45	BHP requests that in the consideration of the location of wind farms, the Council takes into account AHSV designations.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The Spatial Framework for Wind Energy Development, see Policy DM 45.5, identifies that wind turbines will not be acceptable within Strategic Landscape Policy Areas (SLPA). As previously indicated the proposed SLPAs in the DPS recognise the most sensitive landscapes of the Borough and include those areas previously proposed as AHSVs in draft BMAP.
LA03/DPS/0060	Belfast Hills Partnership (BHP)	DM 49	BHP welcomes the DPS approach to Artificial Modification of Watercourses, through "making space for water" and strongly supports all alternatives to culverting watercourses.	No specified modification.	Support noted and welcomed.
LA03/DPS/0061	Northstone (NI) Ltd (Quarryplan)	DM 44	Northstone largely supports the DPS, however considers Policy DM 44 unsound as it seeks only to safeguard mineral reserves rather than reserves and mineral processing sites. Considers, in view of the economic significance of its current processing plant at Ballyginiff Quay – a key landing point for Lough Neagh sand, that the policy wording should be amended to include mineral processing sites as well as mineral reserves.	No specified modification, but requests that the draft Plan Strategy incorporates a 250m safeguarding area around the quay together with a policy presumption in favour of ancillary development associated with the operation of the processing site.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council would advise that Policy DM 44 is intended solely to address Mineral Reserves Policy Areas and that as a consequence the representation is misplaced. Furthermore the Council considers that the concern raised is adequately addressed through the provisions of Policy DM 3, which introduces a presumption against development near to an existing economic development use, such as that found at the Northstone site at Ballyginiff Quay, that would be incompatible with or prejudice its future use.
LA03/DPS/0061	Northstone (NI) Ltd (Quarryplan)	DM 44	Northstone considers that, to allow for potential future expansion at its site at Ballyginiff Quay, there should be a policy within the draft Plan Strategy introducing a 250m safeguarding area around the quay and a consequent policy presumption in favour of ancillary development associated with the operation of the processing site.	Requests that Policy DM 44.2 be amended as follows: "Development within 250m of identified reserves or mineral processing sites will also be carefully scrutinised...."	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5. The Council considers that proposals for expansion of the existing Northstone facility can be adequately addressed through the provisions of Policy DM 2.7 and DM 40.6 .
LA03/DPS/0062	Northern Ireland Water (NIW)	Setting the Context	NIW acknowledge that all relevant Regional and Local Policies have been incorporated into the DPS. NIW considers the indicated predicted population growth is well within original NISRA estimates (2.7%) and the methodology used is well documented and clearly stated in Evidence Paper 1: Population.	No specified modification.	Support noted and welcomed.
LA03/DPS/0062	Northern Ireland Water (NIW)	Setting the Context	NIW acknowledges Para 2.84 of the DPS which highlights where there is currently no remaining capacity for WWTWs in the Borough. NIW will continue to liaise closely with the Council providing data regarding the current and predicted future status of existing NIW water and waste-water infrastructure.	No specified modification.	Noted

LA03/DPS/0062	Northern Ireland Water (NIW)	DM 14	NIW welcomes the inclusion of Policy DM 14.4 but requests an amendment to fully align with NIW policy regarding development encroachment (re: Odour Assessment Policy).	Remove specific proximity distance (300m) to a WWTW - NIW advise that through consultation with NIW in the DM process, an odour dispersion model and report will determine the "area of restraint" and what, if any, mitigation measures are required.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor changes in response to the representation to clarify the position regarding consideration of development in the vicinity of a waste water treatment works (WWTW) as indicated in the policy headline. The suggested changes do not introduce a new policy concept nor change the substance of DM 14. The amendment of the policy text to follow the headline text is in recognition of a minor drafting error and is suggested to fulfil the policy intent which is to consider the impact of development on a WWTW facility and ensure that it does not prejudice its future operation and this remains the case. This approach accords with position set out in the SPPS which is a material consideration to be read alongside the DPS as set out in SP 1.2. The addition of reference to any NIW guidance produced is to highlight something that would constitute a material consideration, whilst the footnote definition that a WWTW includes a pumping station is a factual clarification.</p> <p>Suggested minor change at DM 14.4, page 127 "Proposals involving development within the vicinity of a wastewater treatment works will only be permitted...."</p> <p>Insertion of new paragraph after DM 14.4 "DM 14.5 In assessing proposals the Council will also take into account the provisions of any relevant policy or guidance produced by Northern Ireland Water".</p> <p>Insert footnote after "...of a waste water treatment works..." to say "For the purposes of this policy a Waste Water Treatment Work (WWTW) includes a Waste Water Pumping Station (WWPS).</p>
LA03/DPS/0062	Northern Ireland Water (NIW)	SP 4	NIW considers the housing issues in the Borough are well documented in Evidence Paper 6: Homes and notes that the proposed allocation to each settlement is based on the Spatial Growth Strategy. The proposed allocation of 87% of housing growth to the largest 5 settlements is noted and welcomed.	No specified modification.	Support noted and welcomed.
LA03/DPS/0062	Northern Ireland Water (NIW)	DM 47	NIW indicates general policy support for Sustainable Drainage Systems subject to suggested policy amendment to incorporate a wide range of both soft and hard-engineered SuDS options. Welcomes that all proposals with SuDS must be accompanied by a management plan.	NIW recommend inclusion of 'hard' engineered SuDS solutions - oversized surface water sewers with flow control and attenuation tanks in the list of SuDS listed in DM 47.5.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to acknowledge that Sustainable Drainage Systems (commonly referred to as SuDS) can incorporate hard engineered options as well as 'soft' engineered solutions. This suggested change does not introduce a new policy concept as the principle of SuDs is already established in Policy DM 47, whilst the amplification text serves to provide factual information in relation to examples of SuDs measures to assist in the application of the policy.</p> <p>Suggested minor change at DM 47.5, page 291 "SuDS measures e.g. green roofs; swales; soakaways; basins; ponds; wetlands; and rainwater recycling, 'hard' SuDS measures e.g. oversized storm water pipes with flow control attenuation tanks and permeable paving."</p> <p>The Council is suggesting the following minor change that refers to an example of a hard engineered SuDs technique to complement the suggested change to DM 47 and clarify that such options are acceptable under SuDs. This suggested change does not introduce a new policy concept as the principle of SuDs is already established in Policy DM 47, whilst the amplification text serves to provide factual information in relation to examples of SuDs measures to assist in the application of the policy.</p> <p>Suggested minor change at para. 13.30, page 292 " ... Green roofs, permeable surfaces, oversized storm pipes, water storage..."</p>
LA03/DPS/0062	Northern Ireland Water (NIW)	Whole Plan	NIW consider the DPS as generally sound, subject to proposed minor changes identified in its response.	No specified modification.	Support noted and welcomed.
LA03/DPS/0062	Northern Ireland Water (NIW)	DM 48	NIW indicates general support for the Plan's policy approach to Reservoir Flood Risk, the aim of which is to minimise potential flood risk for developments in close proximity to controlled reservoirs. NIW wish to amend the list of Controlled Reservoirs as defined in the Plan's Amplification text.	NIW recommends that the list of Controlled Reservoirs in the Borough includes the large service reservoir at HydePark Road, Newtownabbey.	<p>Open to minor change.</p> <p>The Council is suggesting the deletion of Para 13.35 as a consequence of ongoing change to the list of Controlled Reservoirs in the Borough since the publication of the DPS. The suggested changes do not introduce a new policy concept as the Council's policy for controlled reservoirs remains unchanged in Policy DM 48 whilst the amplification text can provide information on where to find the details of these reservoirs for the Borough. Given that DfI is responsible for the list of controlled reservoirs and the level of recent changes to this, it is considered reasonable to simply refer the reader to the DfI Reservoir Flood Maps for the most up to date list.</p> <p>Suggested minor change delete para. 13.35 and renumber subsequent paragraphs.</p> <p>Amend to read, " Details of Controlled Reservoirs in the Borough are available on Reservoir Flood Maps produced by DfI (Rivers) and are available to view on its website. These provide..."</p>
LA03/DPS/0063	Belfast International Airport (TSA Planning)	Setting the Context	BIA welcomes that para 2.77 follows the RDS and recognises the Gateway status and strategic economic importance of BIA to both the Borough and Northern Ireland as a whole.	No specified modification.	Support noted and welcomed.

LA03/DPS/0063	Belfast International Airport (TSA Planning)	Strategic Objectives	BIA welcome Strategic Objectives 1-3 as having importance and relevance to Belfast International Airport.	No specified modification.	Support noted and welcomed.
LA03/DPS/0063	Belfast International Airport (TSA Planning)	Strategic Objectives	BIA considers it important in RDS, regional and local terms to have a key objective specifically regarding Belfast International Airport.	BIA suggests the inclusion of a key objective specific to BIA with suggested wording as follows, "To provide for, safeguard and encourage the continued growth of business at Belfast International Airport and its safe and efficient operation in meeting the needs of the travelling public and freight."	Open to minor change. The Council is suggesting the following minor change in response to the representation for the purposes of clarification and in recognition of the acknowledged important role and regional gateway designation of Belfast International Airport (BIA). The suggested minor change does not introduce any new policy concept and it is clear when the DPS and its evidence base are read together that the Council already recognises the status of BIA as a Regional Gateway and is promoting it as a Strategic Employment Location (e.g. SP1, SP 2, SP 3.15). The role and importance of BIA as a Regional Gateway is also included in the Regional Development Strategy 2035 (SFG 15), which remains a material planning consideration. Suggested minor change at Strategic Objective 3, page 58, "...employment locations including the Regional Gateway at Belfast International Airport."
LA03/DPS/0063	Belfast International Airport (TSA)	SP 1	BIA fully supports point (f) of the Spatial Growth Strategy set out in Policy SP 1.6 to strengthen BIA's Gateway status as Northern Ireland's principal airport. Recommends that the wording should be revised to ensure the Regional Gateway status of the Airport is provided for, strengthened, safeguarded and protected.	No specified modification	No change required. The Council considers the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the test "Why we have taken this approach". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. The DPS sets out a range of Strategic Policies and Detailed Management Policies to implement the Growth Strategy which will provide for, strengthen , safeguard and protect the Regional Gateway status of the Airport.
LA03/DPS/0063	Belfast International Airport (TSA Planning)	SP 2	BIA welcomes the Council's approach that continued economic growth across a range of sectors and the creation of new jobs are a key priority. Highlights that Strategic Objectives 1-3 of the DPS are of importance and relevance to BIA.	No specified modification.	Support noted and welcomed.
LA03/DPS/0063	Belfast International Airport (TSA Planning)	SP 2	BIA welcomes the proposed designation of Belfast International Airport as employment land. BIA fully concurs with the DPS designation of the Airport as a Strategic Employment Location, as it recognises the important economic/employment status the Airport retains.	No specified modification.	Support noted and welcomed.

LA03/DPS/0063	Belfast International Airport (TSA Planning)	DM 1	<p>BIA welcomes the proposed acceptable uses at Strategic Employment Locations (Policy DM 1.1). However, BIA considers that this does not reflect the strategic objectives set out regarding the wider range of airport related and complementary uses.</p> <p>The policy only refers to uses that fall within Part B of The Planning (Use Classes) Order (NI) 2015. There are various other uses that fall within different use classes which are appropriate for the Airport Strategic Employment Location that should be contained within the wording of the policy specific to the Airport Strategic Employment Location.</p> <p>Additional clarification of acceptable uses specifically in relation to Belfast International Airport and its Strategic Employment Location is required within the adopted Plan Strategy.</p>	<p>Add policy wording:-</p> <p>To support the sustainable operation of BIA and associated future development the following uses shall be considered as appropriate and acceptable within the designated Airport Operational Area:-</p> <ul style="list-style-type: none"> (i) Aircraft Maintenance Hangars (ii) Airline Engineering Facilities (iii) General Aviation Facilities/Fixed Base Operator Facilities (iv) Motor Transport Buildings (v) Terminal & Associated Airport Operational Uses (vi) Air Cargo Complexes (vii) Freight Warehouses (viii) Distribution Centres (ix) Cold Stores (x) Light Industrial Units (xi) Research & Development Units (xii) Business Units (xiii) Offices (xiv) Data Centres (xv) Retail (xvi) Hotel (xvii) Call Centres (including Serviced Offices) (xviii) Petrol Filling Station with Convenience Store (xix) Bars and Restaurants (xx) Airport Lounges <p>1 of 2</p>	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy provided by the text "Why we have this Policy".</p> <p>SP 2 sets out the strategic policy for SELs and identifies Belfast International Airport as a SEL. Policy SP 2.8 states that until such times as the boundary of the SEL at BIA is identified, the Council will operate a presumption in favour of a wide range of industrial, business, airport related and other complementary employment and service uses on the lands currently zoned at this location for airport related use. In addition, the Council will, in principle support development at BIA that accords or complements the published Airport Masterplan 2030.</p> <p>Policies DM 1, SP 3.15 and DM 13 also set out relevant policy for BIA. All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. This policy base is considered sufficient to allow proper consideration of relevant proposals coming at BIA until the boundary of the proposed SEL, if confirmed, is drawn up at LPP stage.</p> <p>Whilst it is acknowledged a wide range of uses may be appropriate at the proposed SEL for BIA it is noted that the representation does not differentiate between the scale or level of uses proposed, many of which would only be acceptable as an ancillary element in a SEL e.g. retail. It is also considered that the level of detail suggested would be more appropriate at the LPP stage of the Plan or possibly best addressed through specific Supplementary Planning Guidance for the designation.</p>
LA03/DPS/0063	Belfast International Airport (TSA Planning)	DM 1	see above	<p>2 of 2</p> <ul style="list-style-type: none"> (xxi) Creches and Fitness/Leisure Suites (xxii) Railway Station (xxiii) Airport Parking Aprons (xxiv) Airport Car Parks (xxv) Car Hire (xxvi) Car Parking (xxvii) New Roads 	see above
LA03/DPS/0063	Belfast International Airport (TSA Planning)	SP 3	<p>BIA welcomes the Council's approach to Policy SP 3.2, specifically improved accessibility and connectivity to and from BIA.</p> <p>BIA lists improvements that fall under the umbrella of improving connectivity to the Airport</p> <ul style="list-style-type: none"> (i) Motorway spur from the M2 leading to the Airport (ii) Passenger rail connection to the Airport (iii) Improved public transport services direct to/from the Airport for all parts of the Region and directed at lower income areas within the Borough and Greater Belfast in order to enhance employment opportunities. 	No specified modification.	Support noted and welcomed.
LA03/DPS/0063	Belfast International Airport (TSA Planning)	SP 3	<p>BIA indicates that it supports the provision of policy in the DPS that will protect the Airport from unauthorised off-site car parks situated close to the Airport which it considers are impeding the future sustainable growth of the Airport.</p> <p>BIA states that all existing and future carparking requirements can be fully accommodated within the Airport Operational Area and that this is supported by the International Civil Aviation Organisation who recommend that passenger car parking should be as close as possible to their departure destination i.e. the airport itself, in order to minimise traffic movements and to enable airport traffic to be directed along roads and routes designated for this purpose.</p> <p>BIA seeks provision of a policy that will ensure all car parking proposals to serve the Airport are located within the Airport Operational area.</p>	<p>BIA seeks a re-wording of SP 3.12 as follows:</p> <p>"The Borough Council will not permit proposals for new car parking for users of BIA on off-Airport sites to ensure a more sustainable approach to surface transport access to airport."</p>	<p>No change required.</p> <p>The Council considers that Policy SP 3.12 as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS.</p> <p>Policy SP 3.12 states that proposals for the provision of airport related parking at any other location outside of lands allocated for airport related uses will only be supported where a robust analysis is provided by the developer that confirms there is a demonstrable need and the proposal accords with other relevant policies of the LDP.</p> <p>This policy position broadly mirrors the current operational policy as outlined in PPS 3 and it is considered that this has satisfactorily controlled airport car parking proposals coming forward in the vicinity of the airport through the operation of the normal Development Management process.</p>

LA03/DPS/0063	Belfast International Airport (TSA Planning)	SP 3	BIA welcomes the Council's approach to support proposals necessary to maintain, improve or expand existing operational facilities at BIA to meet anticipated growth needs as outlined in Policy SP 3.15.	No specified modification.	Support noted and welcomed.
LA03/DPS/0063	Belfast International Airport (TSA Planning)	DM 13	BIA welcomes the Council's approach to operational development as outlined in Policy DM 13.1.	No specified modification.	Support noted and welcomed.
LA03/DPS/0063	Belfast International Airport (TSA Planning)	DM 13	BIA considers the criteria set out for acceptable operational development at the Airport can be refined and sets out a revised wording for consideration.	BIA suggests the following rewording of Policy DM 13.2: "The proposal is directly related to the operational requirements of the Airport; is clearly related to and dependent upon a site adjacent to the facility or otherwise; represents an improvement to or logical extension to existing facilities and activities of the airport; and is subject to having an acceptable environmental impact.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Policy SP 1 sets out how the Council will assess planning applications and is supported by a range of policies which seek to ensure that the environmental impact of proposals is fully considered. It is further noted that no rationale is provided for the deletion of DM 13.2 (b)
LA03/DPS/0063	Belfast International Airport (TSA Planning)	DM 13	BIA supports the Council's policy regarding the restriction of development within the identified Belfast International Airport Public Safety Zones in accordance with the 'Control of Development in Airport Public Safety Zones' policy.	No specified modification.	Support noted and welcomed.
LA03/DPS/0063	Belfast International Airport (TSA Planning)	DM 13	BIA supports Policy DM 13.4 in relation to Major Noise Zones and the protection it affords to Belfast International Airport's operation.	No specified modification.	Support noted and welcomed.
LA03/DPS/0063	Belfast International Airport (TSA Planning)	DM 13	BIA supports Policy DM 13.5 in relation to Airport Safeguarding in that the Council will consult the Airport operator in relation to all wind and solar energy proposals in the Borough as well as proposals for tall structures within Airport Safety Zones (ASZs).	No specified modification.	Support noted and welcomed.
LA03/DPS/0063	Belfast International Airport (TSA Planning)	Site Specific	BIA advises that it is of critical importance that the Strategic Employment Location (SEL) designation at BIA does not conflict with or have a negative development impact upon the Airport Operational Area or the operations of the airport therein. Considers that the SEL boundary can align with the current Airport Operational Area in order to facilitate the appropriate future development and growth of the Airport SEL. Also considers that there should be flexibility provided by the Plan that in the event that airport operations require to be situated on the Airport SEL designation, this will be supported and permitted. Indicates that the wording of the policy that will establish the SEL boundary at Local Policies Plan Stage should reflect this accordingly.	No specified modification.	It is considered that due to the site-specific nature of this issue, it is a matter to be dealt with at the forthcoming Local Policies Plan stage of the LDP process, which will consider site specific designations and zonings.

LA03/DPS/0064	Client (Inaltus)	DM 17	Inaltus Ltd. considers that affordable housing is clearly distinct from social housing. It remains a matter that needs to be tested carefully on selected sites. Policy does not indicate that affordable housing requirement can be off-set in other ways. Inaltus Ltd. considers that the matter of thresholds needs to be examined and explained in greater detail at Independent Examination.	The Plan Strategy needs to introduce flexibility in respect of DM 17.3, be clearer on the size and type of sites that triggers the requirement, definition of affordable housing needs to be considered and the percentage allocations needs to be reviewed. An ability to offset the requirement should also be considered.	No change required. The Council considers that the policy threshold in relation to Affordable Housing is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS.. The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.
LA03/DPS/0064	Client (Inaltus)	Evidence Paper 6: Housing	Inaltus Ltd. welcomes the identification of lands at Niblock Road and confirms the site is active. Advises that development will commence and be progressed in the coming years.	No specified modification.	Support noted and welcomed.
LA03/DPS/0065	Cairnhill NI (MBA Planning)	Site Specific	Cairnhill NI offer subject lands for housing development; Metropolitan Newtownabbey. Supports the policy direction identified in the POP, which sought to support the policies identified in quashed BMAP relating to MNY 04/27 and MNY 04/29. Four options are presented for housing development, which the representation considers are consistent with Strategic Objectives 7,10 and 11 and Policies SP1, SP 4.2, SP 5.5, DM 9.1, DM 24.1 and specifically DM 40.5. Considers that the proposals are therefore sound to be carried forward to the Local Policies Plan stage.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0066	Northern Ireland Federation of Housing Associations (Turley)	Plan Vision	The Northern Ireland Federation of Housing Associations (NIFHA) stated support for the ambition and drive of ANBC in terms of its Vision for the Council area.	No specified modification.	Support noted and welcomed.
LA03/DPS/0066	Northern Ireland Federation of Housing Associations (Turley)	SP 4	The NIFHA considers that the proposed level of housing growth is unrealistic as it has not been informed by robust evidence. A robust evidence base should be prepared (including the preparation of a Housing Market Area assessment and a robust urban capacity analysis) to support the policy with consideration given as to whether the housing objectives can be met within the proposed allocation of 9,750 units.	No specified modification.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0066	Northern Ireland Federation of Housing Associations (Turley)	SP 4	The NIFHA fully supports the introduction of the policy to deliver affordable housing via two mechanisms, threshold based policy approach and zoning land specifically for affordable housing. Preference is that social housing need would be as part of a wider mixed tenure development.	No specified modification.	Support noted and welcomed.

LA03/DPS/0066	Northern Ireland Federation of Housing Associations (Turley)	DM 17	<p>The NIFHA suggests that the policy is incoherent and the subtle but important distinction between social rented and intermediate housing is not set out.</p> <p>Can find no evidence or rationale to support the threshold requirement and whether alternative thresholds were considered. Concern that policy applies irrespective of need and developers may deliver full quota of affordable housing as intermediate housing. Welcome comments regarding issue of use of Section 76 agreements to secure affordable housing and the intention to bring forward supplementary planning guidance.</p>	<p>Strongly urge Council to include a definition within the policy amplification to avoid confusion and acknowledge that the definition may be subject to change. The policy should be redrafted and supported by robust evidence to underpin proposed thresholds. Reward policy to reflect that new developments in areas of identified social housing need, must address this aspect first.</p>	<p>No change required. The Council considers that the policy is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided by the text "Why we have this Policy".</p> <p>In order to provide for certainty for all parties, the policy should be applied consistently, with the expectation that all proposals of 40 units or greater will be required to deliver affordable units.</p> <p>It is recognised from the NIHE Housing Needs Assessment that there is an affordable housing need across the entire Borough. If policy DM 17.3 was only to be applied to those settlements or geographical locations where a need has been identified, this could significantly undermine the potential of the policy to meet the overall needs of the Borough.</p> <p>While the draft Plan Strategy does not make specific reference to a definition of Affordable Housing, the RDS and SPPS which are material considerations contain a definition on affordable housing and Evidence Paper 6 para. 6.3 identifies that affordable housing is defined as social rented housing and intermediate housing for eligible households. The Council considers that given the current review of the definition of Affordable Housing it would prove difficult to identify a definition in the DPS.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information,</p>
LA03/DPS/0066	Northern Ireland Federation of Housing Associations (Turley)	Site Specific	<p>The NIFHA is unaware of any assessment undertaken to determine whether zoned sites and/or windfall sites are suitable, available or viable for residential development. Concerns regarding para 7.14 of the DPS.</p> <p>Concerns over the impact of a reduced or limited supply on Social Housing Development Programme.</p> <p>Concern over the impact of a reduced or limited supply on Social Housing Development Programme. Urges the Council to keep an open mind as to whether new lands are required as this can only be answered following a complete and robust analysis.</p>	<p>No specified modification.</p>	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0067	Lotus Homes (UK) Ltd. (TSA Planning)	SP 4	<p>Lotus Homes (UK) Ltd considers the current housing growth figure is too restrictive when considering the LDP timetable and potential change in circumstances prior to the adoption of the LPP.</p> <p>Notes the flexible approach taken by the Council in respect of economic development land and advocates a similar approach should also be adopted in respect of housing growth to allow for adequate flexibility in light of any change in circumstances.</p>	<p>Amend overall housing growth figure to at least 11,050 units for the period to 2032.</p>	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. The Council has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p> <p>The plan period relating to the entire DPS runs from 2015 to 2030 and the Council can see no reason to extend the period to 2032.</p>
LA03/DPS/0067	Lotus Homes (UK) Ltd. (TSA Planning)	SP 4	<p>Lotus Homes (UK) Ltd. considers the needs of specific settlements do not appear to have formed part of the Council's housing growth allocation process. DPS has not taken sufficient account of sustainable development; has not analysed availability of housing lands; and the NIHE Housing Needs Assessment, when allocating growth.</p> <p>There has been an over allocation to hamlets at the expense of villages which is restrictive and not in line with the Spatial Growth Strategy or other policies to promote sustainable development. The allocation to Crumlin and Randalstown is unrealistic and inappropriate, and the allocation to the countryside is not realistic.</p> <p>Lotus Homes (UK) Ltd. provides an amended housing allocation across the Borough (table 7 of submission) which they consider represents a more sound, sustainable and balanced split than that identified in the DPS. This indicates a reduced proportion of housing growth to Antrim and Ballyclare, as well as the hamlets and the countryside whilst increasing the proportion for Crumlin and Randalstown, and the villages of the Borough.</p>	<p>Amend housing allocation in accordance with table 7 of submission.</p> <p>Amend para. 7.10 to reference that allocations have also been informed by housing need within settlements.</p>	<p>No change required. It is considered that the housing allocation is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of settlements. It is considered that an increase in the overall housing allocation would be at odds with the considerations identified above.</p> <p>The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>

LA03/DPS/0067	Lotus Homes (UK) Ltd. (TSA Planning)	DM 17	<p>Lotus Homes (UK) Ltd is supportive of proposed policy. Threshold is both reasonable and sound. Policy amplification does not currently provide a clear definition of 'affordable housing', leading to ambiguity.</p> <p>Requests that a definition of Affordable Housing be included in the Amplification text to identify social rented and intermediate housing with an acknowledgement that this definition may be expanded in future.</p> <p>In addition, requests an increase in the overall housing growth figure for the Borough and an amended allocation to settlements to ensure affordable homes policy can be adequately implemented.</p>	<p>Revise amplification text of policy DM 17 to include a definition of Affordable Housing to read: "For the purposes of Policy DM 17.3, affordable housing is taken to mean Social Rented housing and/or Intermediate Housing including Shared Ownership Housing and rent to own." Acknowledgment in the text that this definition may be expanded in the future.</p> <p>Increase the overall housing growth figure for the Borough and bring forward an amended allocation to settlements.</p>	<p>Support for Policy DM 17 noted and welcomed. While the draft Plan Strategy does not make specific reference to a definition of Affordable Housing, Evidence Paper 6 para. 6.3 identifies that affordable housing is defined as social rented housing and intermediate housing for eligible households. The Council considers that given the current review of the definition of Affordable Housing it would prove difficult to identify a definition in the DPS.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p> <p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p>
LA03/DPS/0067	Lotus Homes (UK) Ltd. (TSA Planning)	SP 4	<p>Lotus Homes (UK) Ltd. considers the Plan has an over emphasis on excess of existing housing commitments, as evidence is not sufficiently robust. Committed sites have not been sufficiently interrogated to ensure they are adequate and available. No consultation with landowners to assess deliverability over the plan period, and therefore this supply is over presumptuous.</p>	<p>Remove reference in para. 7.13 and 7.14 to an excess/ample supply of committed housing sites and replace with a commitment to carry out additional analysis, including consultation with landowners, which will inform the need and location of additional lands at Local Policies Plan stage.</p>	<p>No change required. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. The Council considers that this provides clear evidence at a strategic level on the amount of committed housing across the Borough to inform both the Spatial Growth Strategy and the Homes section of the DPS.</p> <p>A more detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0067	Lotus Homes (UK) Ltd (TSA)	Miscellaneous	<p>Given that the publication of the DPS and consultation period is currently 6 to 9 months behind schedule, Lotus Homes (UK) Ltd. feel it is reasonable to anticipate that the full adoption of the Plan will be delayed past the March 2024 timeframe. Considers this could result in less than 5 years between the adoption of the Plan and the end of the Plan period. Given these delays and therefore the limited time for review and amendment of the Plan prior to 2030, Lotus Homes (UK) Ltd. believe it would be appropriate to include a housing growth figure to 2032 to allow for adequate flexibility and time to review in the event of a newly amended timetable.</p>	<p>No specified modification.</p>	<p>No change required. The DPS has been published within its published Timetable which will be kept under review. The LDP period does not need to be extended to 2032 in order to maintain/deliver a 5 year housing supply as current evidence indicates there is a more than adequate supply of deliverable housing across the Borough. A new LDP Timetable was published in October 2020.</p>
LA03/DPS/0068	Lotus Homes (UK) Ltd. (TSA)	SP 4	<p>Lotus Homes (UK) Ltd. considers the current housing growth figure is too restrictive when considering the LDP timetable and potential change in circumstances prior to the adoption of the Local Policies Plan.</p> <p>Notes the flexible approach taken by the Council in respect of economic development land and advocates a similar approach should also be adopted in respect of housing growth to allow for adequate flexibility in light of any change in circumstances.</p>	<p>Amend overall housing growth figure to at least 11,050 units for the period to 2032.</p>	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p> <p>The plan period relating to the entire DPS runs from 2015 to 2030 and the Council can see no reason to extend the period to 2032. A new LDP Timetable was published in October 2020.</p>
LA03/DPS/0068	Lotus Homes (UK) Ltd. (TSA)	SP 4	<p>Lotus Homes (UK) Ltd. considers the needs of specific settlements do not appear to have formed part of the allocation process. DPS has not taken sufficient account of sustainable development; has not analysed availability of housing lands; and the NIHE Housing Needs Assessment, when allocating growth. There has been an over allocation to hamlets at the expense of villages which is restrictive and not in line with the Spatial Growth Strategy or other policies to promote sustainable development. Allocation to Crumlin and Randalstown is unrealistic and inappropriate and the allocation to the countryside is not realistic.</p> <p>Provides an amended housing allocation across the Borough (table 7 of submission) which they consider represents a more sound, sustainable and balanced split than that identified in the DPS. This indicates a reduced proportion of housing growth to Antrim and Ballyclare, as well as the hamlets and the countryside while increasing the proportion for Crumlin and Randalstown and the villages of the Borough.</p>	<p>Amend housing allocation in accordance with table 7 of submission.</p> <p>Amend para. 7.10 to reference that allocations have also been informed by housing need within settlements.</p>	<p>No change required. It is considered that the housing allocation is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of settlements. It is considered that an increase in the overall housing allocation would be at odds with the considerations identified above.</p> <p>The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation, Evidence Paper 6 and Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>

LA03/DPS/0068	Lotus Homes (UK) Ltd. (TSA)	DM 17	<p>Lotus Homes (UK) Ltd is supportive of proposed policy. Considers the proposed threshold is both reasonable and sound. Policy amplification does not currently provide a clear definition of 'affordable housing', leading to ambiguity.</p> <p>Requests that a definition of Affordable Housing be included in the amplification text to identify social rented and intermediate housing with an acknowledgement that this definition may be expanded in future.</p> <p>In addition, requests an increase in the overall housing growth figure for the Borough and an amended allocation to settlements to ensure affordable homes policy can be adequately implemented.</p>	<p>Revise amplification text of policy DM 17 to include a definition of Affordable Housing to read: "For the purposes of Policy DM 17.3, affordable housing is taken to mean Social Rented housing and/or Intermediate Housing including Shared Ownership Housing and rent to own." Acknowledgment in the text that this definition may be expanded in the future.</p> <p>Increase the overall housing growth figure for the Borough and bring forward an amended allocation to settlements.</p>	<p>Support for Policy DM 17 noted and welcomed. Whilst the Draft Plan Strategy does not make specific reference to a definition of Affordable Housing, the SPPS as well as Evidence Paper 6 para. 6.3 identifies that affordable housing is defined as social rented housing and intermediate housing for eligible households. The Council considers that given the current review of the definition of Affordable Housing it would prove difficult to identify a definition in the DPS.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing.</p> <p>The Council has identified what it considers to be a reasonable and appropriate housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information including the DfI response to the POP and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p>
LA03/DPS/0068	Lotus Homes (UK) Ltd. (TSA)	SP 4	<p>Lotus Homes (UK) Ltd considers there an over emphasis on excess of existing housing commitments, as evidence is not sufficiently robust. Committed sites have not been sufficiently interrogated to ensure they are adequate and available. No consultation with landowners to assess deliverability over the plan period, and therefore this supply is over presumptuous.</p>	<p>Remove reference in para. 7.13 and 7.14 to an excess/ample supply of committed housing sites and replace with a commitment to carry out additional analysis, including consultation with landowners, which will inform the need and location of additional lands at Local Policies Plan stage.</p>	<p>No change required. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. The Council considers that this provides clear evidence at a strategic level on the amount of committed housing across the Borough to inform both the Spatial Growth Strategy and the Homes section of the DPS.</p> <p>A more detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0068	Lotus Homes (UK) Ltd. (TSA)	Site Specific	<p>Lotus Homes (UK) Ltd. analysis of housing land availability indicates that there is remaining yield of three dwellings in Ballyrobert, which differs from that presented in the Council's Evidence Paper 6: Housing.</p>	<p>No specified modification.</p>	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p> <p>The Council notes that the representation contains a number of figures which differ from those published in Evidence Paper 6: Housing. The Council considers that the parameters used by the objector may differ from those employed by the Council in the respective studies and therefore explain the variation. For example, the base date of each study and what is determined to be a 'completed' unit may differ.</p>
LA03/DPS/0068	Lotus Homes (UK) Ltd. (TSA)	Site Specific	<p>Lotus Homes (UK) Ltd. requests subject lands be considered for housing development: Ballyrobert.</p>	<p>Inclusion/zoning of land for development.</p>	<p>Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p>
LA03/DPS/0068	Lotus Homes (UK) Ltd (TSA)	Miscellaneous	<p>Given that the publication of the DPS and consultation period is currently 6 to 9 months behind schedule, Lotus Homes (UK) Ltd. considers it is reasonable to anticipate that the full adoption of the Plan will be delayed past the March 2024 timeframe. This could result in less than 5 years between the adoption of the Plan and the end of the Plan period. Given these delays and therefore the limited time for review and amendment of the Plan prior to 2030, we believe it would be appropriate to include a housing growth figure to 2032 to allow for adequate flexibility and time to review in the event of a newly amended timetable.</p>	<p>No specified modification.</p>	<p>No change required. The DPS has been published within its published Timetable which will be kept under review.</p> <p>The LDP period does not need to be extended to 2032 in order to maintain/deliver a 5 year housing supply as current evidence indicates there is a more than adequate supply of deliverable housing across the Borough. The new LDP Timetable was published in October 2020.</p>
LA03/DPS/0069	Lotus Homes (UK) Ltd. (TSA)	SP 4	<p>Lotus Homes (UK) Ltd. considers the current housing growth figure is too restrictive when considering the LDP timetable and potential change in circumstances prior to the adoption of the Local Policies Plan.</p> <p>Notes the flexible approach taken by the Council in respect of economic development land and advocates a similar approach should also be adopted in respect of housing growth to allow for adequate flexibility in light of any change in circumstances.</p>	<p>Amend overall housing growth figure to at least 11,050 units for the period to 2032.</p>	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p> <p>The plan period relating to the entire DPS runs from 2015 to 2030 and the Council can see no reason to extend the period to 2032. A new LDP Timetable was published in October 2020.</p>

LA03/DPS/0069	Lotus Homes (UK) Ltd. (TSA)	SP 4	<p>Lotus Homes (UK) Ltd. considers the needs of specific settlements do not appear to have formed part of the allocation process. Considers the DPS has not taken sufficient account of sustainable development; has not analysed the availability of housing lands; and the NIHE Housing Needs Assessment, when allocating growth.</p> <p>Considers there has been an over allocation to hamlets at the expense of villages which is restrictive and not in line with the Spatial Growth Strategy or other policies to promote sustainable development. Allocation to Crumlin and Randalstown is unrealistic and inappropriate, and the allocation to the countryside is not realistic.</p> <p>Provides an amended housing allocation across the Borough (table 7 of submission) which they consider represents a more sound, sustainable and balanced split than that identified in the DPS. This indicates a reduced proportion of housing growth to Antrim and Ballyclare, as well as the hamlets and the countryside, whilst increasing the proportion for Crumlin and Randalstown and the villages of the Borough.</p>	<p>Amend housing allocation in accordance with table 7 of submission.</p> <p>Amend para. 7.10 to reference that allocations have also been informed by housing need within settlements.</p>	<p>No change required. It is considered that the housing allocation is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of settlements. It is considered that an increase in the overall housing allocation would be at odds with the considerations identified above.</p> <p>The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0069	Lotus Homes (UK) Ltd. (TSA)	DM 17	<p>Lotus Homes (UK) Ltd are supportive of proposed policy. Threshold is both reasonable and sound. Policy amplification does not currently provide a clear definition of 'affordable housing', leading to ambiguity.</p> <p>Requests that a definition of Affordable Housing be included in the amplification text to identify social rented and intermediate housing with an acknowledgement that this definition may be expanded in future.</p> <p>In addition, requests an increase in the overall housing growth figure for the Borough and an amended allocation to settlements to ensure affordable homes policy can be adequately implemented.</p>	<p>Revise amplification text of policy DM 17 to include a definition of Affordable Housing to read: "For the purposes of Policy DM 17.3, affordable housing is taken to mean Social Rented housing and/or Intermediate Housing including Shared Ownership Housing and rent to own." Acknowledgment in the text that this definition may be expanded in the future.</p> <p>Increase the overall housing growth figure for the Borough and bring forward an amended allocation to settlements.</p>	<p>Support for policy DM 17 noted and welcomed. While the Draft Plan Strategy does not make specific reference to a definition of Affordable Housing, the SPPS as well as Evidence Paper 6 para. 6.3 identifies that affordable housing is defined as social rented housing and intermediate housing for eligible households. The Council considers that given the current review of the definition of Affordable Housing it would prove difficult to identify a definition in the DPS.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing.</p> <p>The Council has identified what it considers to be a reasonable and appropriate housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information including the DfI response to the POP and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p>
LA03/DPS/0069	Lotus Homes (UK) Ltd. (TSA)	SP 4	<p>Lotus Homes (UK) Ltd. considers there is an over emphasis on excess of existing housing commitments, as evidence is not sufficiently robust. Committed sites have not been sufficiently interrogated to ensure they are adequate and available. No consultation with landowners to assess deliverability over the plan period, and therefore this supply is over presumptuous.</p>	<p>Remove reference in para. 7.13 and 7.14 to an excess/ample supply of committed housing sites and replace with a commitment to carry out additional analysis, including consultation with landowners, which will inform the need and location of additional lands at the LPP stage.</p>	<p>No change required. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. The Council considers that this provides clear evidence at a strategic level on the amount of committed housing across the Borough to inform both the Spatial Growth Strategy and the Homes section of the DPS.</p> <p>A more detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0069	Lotus Homes (UK) Ltd. (TSA)	Site Specific	<p>Evidence Paper 6: Housing indicates that the total potential housing yield in Randalstown is 651 units. Lotus Homes (UK) Ltd. considers that it is not reasonable to presume that all lands will be made available to deliver housing growth within the Plan period, for example housing monitor reference site 113748.</p> <p>Further analysis is required regarding the evidence of housing supply. Once a robust assessment has been carried out, considers an extension to the existing Randalstown Settlement Development Limit will be required to facilitate the delivery of housing growth.</p>	<p>No specified modification.</p>	<p>No change required. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. The Council considers that this provides clear evidence at a strategic level on the amount of committed housing across the Borough to inform both the Spatial Growth Strategy and the Homes section of the DPS.</p> <p>A more detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0069	Lotus Homes (UK) Ltd. (TSA)	Site Specific	<p>Lotus Homes (UK) Ltd. requests subject lands be considered for housing development: Randalstown.</p>	<p>Inclusion/zoning of land for development.</p>	<p>Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p>

LA03/DPS/0069	Lotus Homes (UK) Ltd (TSA)	Miscellaneous	Given that the publication of the DPS and consultation period is currently 6 to 9 months behind schedule, Lotus Homes (UK) Ltd considers it is reasonable to anticipate that the full adoption of the Plan will be delayed past the March 2024 timeframe. This could result in less than 5 years between the adoption of the Plan and the end of the Plan period. Given these delays and therefore the limited time for review and amendment of the Plan prior to 2030, Lotus Homes (UK) Ltd. believe it would be appropriate to include a housing growth figure to 2032 to allow for adequate flexibility and time to review in the event of a newly amended timetable.	No specified modification.	No change required. The DPS has been published within its published Timetable which will be kept under review. The LDP period does not need to be extended to 2032 in order to maintain/deliver a 5 year housing supply as current evidence indicates there is a more than adequate supply of deliverable housing across the Borough. A new LDP Timetable was published in October 2020.
LA03/DPS/0070	Bombardier Aerospace	SP 2	Bombardier Aerospace welcomes the Council's aspiration within the DPS to help facilitate the growth of up to 9,000 new jobs by 2030 and to operate a presumption in favour of employment-related development.	No specified modification.	Support noted and welcomed.
LA03/DPS/0070	Bombardier Aerospace	SP 2	Bombardier Aerospace considers that due to environmental constraints and the changing nature of the surrounding area, the lands identified at Church Road, Newtownabbey do not function as a SEL. Considers the policy does not provide flexibility to enable the Strategy to deal with changing circumstances.	Delete the proposed SEL at Church Road, Newtownabbey.	No change required. The Council considers the designation as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". In conjunction with the Council's Economic Strategy, an Employment Land Evaluation Report (ELER) was undertaken in support of the Plan Strategy as set out in Evidence Paper 3: Economic Growth. This has provided a robust analysis of our Borough's employment land portfolio and supports the identification of a range of existing Strategic Employment Locations. Church Road, Newtownabbey is already home to established businesses and has been therefore identified as an 'Existing Strategic Employment Location'. Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider site specific designations/boundaries and the zoning of land.
LA03/DPS/0070	Bombardier Aerospace	Evidence Paper 3: Economic Growth	Bombardier Aerospace note that the evidence base used to inform the DPS includes an ELER. Considers that this study contains inaccuracies and the robustness of the Council's evidence base is therefore questioned.	No specified modification.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality, this includes Evidence Paper 3: Economic Growth as well as the "Introduction" and "Why we have taken this approach" for Strategic Policy 2. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage. Evidence Paper 3: Economic Growth, which includes the ELER was prepared at a point in time. It was used to inform the principle of an SEL at this site. The exact boundaries of SELs will be undertaken at the LLP stage. There is no impact on the soundness of the DPS as published and the Council will be updating its evidence base at the LPP stage when boundaries will be drawn.
LA03/DPS/0071	Vaughan Homes (TSA Planning)	Site Specific	Vaughan Homes requests subject lands be considered for housing development: Ballyclare.	Inclusion/zoning of land for housing development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0071	Vaughan Homes (TSA Planning)	Site Specific	Whilst Vaughan Homes acknowledges the issue of over-zoning in Ballyclare, the Council must consider the over reliance on one major zoning to deliver the housing need.	Consideration given to zoning a small extension for an alternative house builder to create competition and choice for home purchasers.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0072	P Madden (TC Town Planning)	SP 1	Mr. P Madden considers that Policy SP 1, the Spatial Growth Strategy and 'Places of the Borough' are generally sound.	Toome should be recognised as a rural gateway. It has direct links to the cities of Derry / Londonderry and Belfast, and provides an ideal location of settlement along the A6 commuter belt.	No change required. The Council considers the Spatial Growth Strategy as drafted is appropriate and reasonable. It has taken account of the provisions of the RDS and SPPS. The rationale for the policy approach is set out in "Why we have taken this approach". Further evidence in relation to the role and function of Toome is set out in Evidence Paper 2 Settlement Evaluation including paras 8.31- 8.37 and pages 105-108.
LA03/DPS/0072	P Madden (TC Town Planning)	SP 4	Mr. P Madden considers that the proposed housing growth allocation to Toome of 55 new units, may be somewhat restrictive due it's the location and connectivity.	No specified modification	No change required. It is considered that the 55 unit housing allocation proposed for Toome is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Toome. It is considered that an increase in the overall housing allocation to Toome would be at odds with the considerations identified above. The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0072	P Madden (TC Town Planning)	Site Specific	Mr. P Madden: Subject lands are offered for housing development - Toome.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.

LA03/DPS/0072	P Madden (TC Town Planning)	Site Specific	Mr. P Madden considers that land within the current settlement limit of Toome is very restricted in terms of growth and land provision due to (1) the floodplain as per Strategic Flood Map NI, and (2) the A6 road network. Land outside of the settlement limit to the west is subject to flooding and constrained to the east by the A6, with other protected natural heritage sites associated with Lough Neagh.	Explore land to the south to enable the sustainability of the village and future growth throughout the lifetime of the new plan.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0073	EIPSO 4 Antrim S.a.r.l (TSA Planning)	SP 2	EPISO 4 Antrim S.a.r.l. suggests that Antrim would be better classified as a Tier 2 'Town Centre' within the retail hierarchy, rather than as a Tier 1 'Large Town Centre'. The representation includes a consultancy paper which considers that performance of Antrim Town Centre is considerably weaker than that of the Abbey Centre and contends that it is not significantly larger than Ballyclare Town Centre which is characterised as a Tier 2 Town Centre.	Policy SP 2.12 should be amended to reclassify Antrim as a Tier 2 Town Centre.	No change required. The Council considers that the proposed Retail Hierarchy as set out on page 79 of the DPS is appropriate and reasonable and that the classification of Antrim Town Centre as a Tier 1 Large Town Centre is justified and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Evidence Paper 4: Retail and Commercial Leisure, pages 31-36 sets out existing health check indicators and analysis of Antrim Town Centre in support of its classification in the Retail Hierarchy.
LA03/DPS/0073	EIPSO 4 Antrim S.a.r.l (TSA Planning)	DM 8	EPISO 4 Antrim S.a.r.l objects to Policy SP2.12(e) and the provisions of Policy DM 8, which it considers seeks to impose a range of unnecessary restrictions on future development at The Junction, Antrim. Considers that the Junction and Antrim Town Centre have a complimentary rather than a competitive relationship and that Antrim Town Centre is not strong enough on its own to compete against the appeal of nearby Ballymena. Indicates that seeking to restrict future development at The Junction through Policy DM 8 whilst intended to protect the traditional Town Centre would perversely have the effect of weakening it. Considers that Policy DM 8 is overly onerous and advises that Policies DM 6 and DM 7 of the Plan provide adequate policy to assess the potential impacts of out-of-centre development, including proposals at the Junction.	Delete SP 2.12 (e) reference to The Junction and Policy DM 8.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy". The Council considers a Town Centre First policy accords with the provisions of the SPPS and the need for a specific policy relating to future development at the Junction takes account of local circumstances. Whilst acknowledging that the retail offer at the Junction can complement the role of the traditional Town Centre there is a need to ensure it remains distinguishable from the Town Centre, which should remain as the first choice for a range of town centre uses. The DPS's evidence base for centres is set out in Evidence Paper 4: Retail and Commercial Leisure. This document should be read for further information.
LA03/DPS/0074	Dr Daniel Kane (Drumadarragh & District Residents Association)	Setting the Context	DADRA welcomes that once the DPS is formally adopted, planning policies within it will replace the existing suite of Planning Policy Statements previously published by DfI. Representation supported by 8 Annexes and 24 DVD media submissions.	No specified modification.	Support noted and welcomed. The Council notes the contents of DADRA's submitted annexes and 24 media submissions.
LA03/DPS/0074	Dr Daniel Kane (Drumadarragh & District Residents Association)	SP 1	DADRA welcomes the Council's inclusion of the precautionary principle within Policy SP 1.	No specified modification.	Support noted and welcomed

LA03/DPS/0074	Dr Daniel Kane (Drumadarragh & District Residents Association)	SP 1	DADRA considers the Council must stand firm on the proposal to agree financial guarantee and bonds to ensure that decommissioning, restoration aftercare or mitigation measures actually do take place in the case of minerals workings or renewable energy schemes.	No specified modification.	Noted and no change required. This is an operational matter that will be dealt with as part of the normal Development Management process and does not question the detail or principle of the policy approach.
LA03/DPS/0074	Dr Daniel Kane (Drumadarragh & District Residents Association)	DM 9	DADRA consider it heartening to see a different approach being taken in the DPS (DM 9.10 (d) and para 11.31), compared to previous application by LPAs, in particular the requirement that satisfactory information must be submitted for proposals in the countryside to demonstrate a robust business case. Considers that the approach taken in DM 9.10 (d) should be extended to all renewable energy applications.	No specified modification.	Support noted and welcomed.
LA03/DPS/0074	Dr Daniel Kane (Drumadarragh & District Residents Association)	SP 8	DADRA welcomes the Council's policy approach to Strategic Landscape Policy Areas.	No specified modification.	Support noted and welcomed.
LA03/DPS/0074	Dr Daniel Kane (Drumadarragh & District Residents Association)	DM 45	DADRA considers it futile to insist on robust evidence from applicants, if the standard against which they will be measured itself makes erroneous claims, such as stated separation distances resolving all problems of noise, shadow flicker, etc. Policy refers to '10 times the rotor diameter'. Considers this makes incorrect assumptions and lacks an evidence base. The current inadequate separation distances of wind turbines should not be reduced further. Advises this must be abandoned as a method of protecting residents since it has no evidential basis. Instead of making another category of turbine, the original minimum separation distance of 500 m for all turbines, should be rigorously applied until adequate independent evidence is available to set a more realistic minimum. It appears that the neighbours of existing and future wind energy installations do not warrant the same degree of consideration in terms of proximity of tall structures or the breaking of their skyline. Advises that this position contrasts with other DPS Policies e.g. DM 40.2 (c) and DM 43.5 (regarding the visual impact of development on landscape).	Amend text to require a minimum separation distance of 500 m for all turbines from occupied properties.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council would advise that all policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. As a consequence all proposals for renewable energy, including wind turbine proposals, will be assessed against all aspects of Policy DM 45 as well as all other relevant policies set out in the Plan Strategy document and other material considerations. The Council would point out that the current policy set out in the SPPS requires a 500 m separation distance for 'wind farm' development, whereas Policy DM 45.6 seeks to apply this to all wind turbine developments, including individual proposals where these are above 25 m hub height.
LA03/DPS/0074	Dr Daniel Kane (Drumadarragh & District Residents Association)	DM 45	DADRA note that Policy DM 45.4 refers to PPS 18 Best Practice Guidance, which retains noise standard ETSU-R-97 that is used for wind energy applications. DADRA consider this noise standard has significant shortcomings, as set out in the detailed supporting information accompanying its representation.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the Policy is provided in the text "Why we have this Policy". DM 45.4 indicates that the Council will take account of PPS 18 Best practice Guidance (BPG) in assessing proposals for renewable energy development. The Council considers this BPG provides advice on a range of renewable energy development, which is beneficial in considering the various types of proposals and it is one amongst a number of material considerations. It is acknowledged that the BPG incorporates guidance on wind turbines and advises that ETSU-R-97 is the UK government's preferred method of assessing wind farm noise for planning purposes. However, the Council would also acknowledge that additional and more recent information sources also exist such as the Institute of Acoustics Good Practice Guide to the Application of ETSU-R-97 for the Assessment and Rating of Wind Turbine Noise which can also be taken into account as part of the normal development management process. It is understood that the Department for Infrastructure is currently reviewing planning policy for renewable energy development and this may in due course result in updated Best Practice Guidance which is likely to be subject to public consultation. Furthermore, the Council would advise all wind turbine developments would be consulted to its Environmental Health section to provide expert opinion on noise issues based on the most up to date information sources.

LA03/DPS/0074	Dr Daniel Kane (Drumadarragh & District Residents Association)	SP 10	DADRA are encouraged that the Council recognises the link between the quality of our environment and the health and wellbeing of our population.' However DADRA considers that SP 10.6 (p281) and 13.9 (p284) relates only to major hazards and contaminated land, levels of pollution or negative impacts on the health and safety of our residents relating to those matters and to which public safety will be the overriding priority. Consider that neighbours of existing and future energy installations throughout the borough are not being extended this same level of protection.	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>Policy SP 10 clearly advises that the Council will scrutinise development proposals with the potential to create pollution to ensure there is no unacceptable impact on people or the environment. This would any public safety impacts arising from wind energy development.</p> <p>In addition, Paragraph 13.9 'Environmental Protection' clearly states that it relates to consideration of "any development proposals with the potential to contribute to a rise in levels of pollution or that may negatively impact on the health and safety of our residents".</p>
LA03/DPS/0074	Dr Daniel Kane (Drumadarragh & District Residents Association)	Whole Plan	DADRA considers regional legacy policy is flawed (SPPS and PPS 18), and notes concerns regarding legacy planning decisions. The DPS does not recognise the responsibility to comply with the fundamental rights protected by the Convention for the Protection of Human Rights and Fundamental Freedoms (Article 8 and Article 6). Concerns about future planning decisions. Absence of public participation in the setting of targets, and the public interest test.	No specified modification.	<p>No change required. A large number of the matters and concerns raised relate to broader Government policy and therefore fall out with the scope of LDP process.</p> <p>The Council considers the Plan Strategy as drafted to be reasonable and appropriate. It has taken account of the provisions of the Regional Development Strategy, the SPPS and other relevant policy and guidance as set out in Section 2 of the document.</p> <p>The Council is also satisfied that its processes and practices, including preparation of the Draft Plan Strategy, are compatible with the ECHR. The planning system by its very nature respects the rights of the individual whilst acting in the interest of the wider community. It is an inherent part of the decision-making process for the Council to assess the effects that a proposal will have on individuals (taking account of relevant plans, policy, guidance and other material considerations) and weigh these against the wider public interest in determining whether development should be allowed to proceed. In carrying out this balancing exercise, the Council will of course wish to be satisfied that it has acted proportionately.</p>
LA03/DPS/0075	Nutts Corner Enterprise Park (One2OnePlanning)	SP 1	Nutts Corner Enterprise Park supports Policies SP 1.6 (f), SP 1.7 and SP 1.11 as they are considered consistent with the principles of sustainable development and job creation.	No specified modification.	The Council welcomes support from Nutts Corner Enterprise Park regarding the Spatial Growth Strategy and the Places of the Borough.
LA03/DPS/0075	Nutts Corner Enterprise Park (One2One Planning)	SP 2	The Council's intention to designate a SEL at Nutts Corner is fully supported by Nutts Corner Enterprise Park. Supports Policies SP 2, SP 2.2 and SP 2.3 as they relate to the inclusion of Nutts Corner as a SEL.	No specified modification.	Support noted and welcomed.
LA03/DPS/0075	Nutts Corner Enterprise Park (One2One Planning)	DM 1	<p>Nutts Corner Enterprise Park notes that Policy DM 1 references settlements in its policy title. Nutts Corner SEL designation appears misplaced in DM 1.1 given its countryside location without a current designated boundary. It would be more accurate to have a separate policy for clarity.</p> <p>Evidence Paper 3, para. 11.29 envisaged a tailored policy for Nutts Corner Strategic Employment Location. This has not been done.</p>	Nutts Corner should have a distinct policy commensurate with the importance of the site in the delivery of the Borough's job creation potential.	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Policy DM 1.1 should be read alongside Policy SP 2.</p> <p>Policy SP 2 is implemented by a number of policies including Policy DM 1.1 which relates to all SELs and therefore will include those to be zoned inside settlements and those zoned outside settlements.</p> <p>A policy tailored to Nutts Corner is set out in Policy DM 1.1. The Council will consider key site requirements at the LPP stage.</p> <p>The DPS's evidence base for Strategic Employment Locations is set out in Evidence Paper 3: Economic Growth. This document should be read for further information.</p>
LA03/DPS/0075	Nutts Corner Enterprise Park (One2One Planning)	DM 1	Nutts Corner Enterprise Park considers there are omissions in the DPS regarding strategic requirements related to delivery, including spine road and data connection. Considers the Plan is not clear that the zoning can be delivered. Considers that if specifics are to be developer funded, this should be set out within the overarching policy for the area.	Rather than leaving all strategic infrastructure requirements to LPP KSRs, the Council should undertake a masterplan for the proposed SEL at Nutts Corner.	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided by the text "Why we have this Policy".</p> <p>The LDP is a two stage process and the Council carried out a strategic transport assessment at the DPS stage in order to assess traffic issues and potential mitigation measures in relation to the proposed SEL at Nutts Corner.</p> <p>The Council will continue to work with stakeholders to identify KSR's for the proposed SEL at Nutts Corner at the LPP stage.</p> <p>The DPS's evidence base for Strategic Employment Locations is set out in Evidence Paper 3: Economic Growth. This document should be read for further information.</p>

LA03/DPS/0075	Nutts Corner Enterprise Park (One2One Planning)	DM 1	Nutts Corner Enterprise Park considers the Plan's omission of business uses and research and development from the list of acceptable uses. Considers a strategic policy specifically for Nutts Corner Strategic Employment Location would have assisted in the promotion of a greater range of uses including B1 and B2 use classes.	Refer to business or research and development uses being ancillary to the permissible uses in Policy DM 1.1, or a percentage cap could be included to control the areas in use by non-storage and distribution, transportation or industrial users.	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided by the text "Why we have this Policy".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. DM 1.1 should be read alongside SP 2.</p> <p>SP 2 refers to the ELER, included within Evidence Paper 3: Economic Growth, which supports the identification of a range of existing Strategic Employment Locations including the strategically located Nutts Corner site.</p> <p>Nutts Corner is already home to a number of large-scale businesses that are focused on storage and distribution as well as industry. These benefit from accessible and central locations with easy access to the RSTN and gateways.</p> <p>As such Nutts Corner has been identified as a Strategic Employment Location with uses limited to industrial development, transport and logistics and storage and distribution proposals. B1 business uses are directed towards our settlements and gateways in order to promote sustainable development and deliver our Spatial Growth Strategy which has been informed and is consistent with the RDS.</p>
LA03/DPS/0075	Nutts Corner Enterprise Park (One2One Planning)	DM 1	Nutts Corner Enterprise Park considers there should be recognition in policy for historic uses within the proposed SEL at Nutts Corner SEL. Brownfield land should still be a source of employment growth as it is more sustainable than greenfield expansion but that is not clear from policy.	The brownfield context of old airfields should be recognised and the full scope of employment related businesses should be delivered at the site including business classes and Research and Development.	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is included in the text "Why we have this Policy".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Policy DM 1.1 should be read alongside Policy SP 2.</p> <p>Policy SP 2.5 states that precise boundaries of SELs will be brought forward at the LPP.</p> <p>Policy SP 2 refers to the ELER, included within Evidence Paper 3: Economic Growth, which supports the identification of a range of existing SELs including the strategically located Nutts Corner site.</p> <p>Nutts Corner is already home to a number of large-scale businesses that are focused on storage and distribution as well as industry. These require accessible and central locations with easy access to the RSTN and gateways.</p> <p>As such, Nutts Corner has been identified as a SEL with uses limited to industrial development, transport and logistics and storage and distribution proposals. B1 business uses are directed towards our settlements and gateways in order to promote sustainable development and deliver our Spatial Growth Strategy which has been informed and is consistent with the RDS.</p>
LA03/DPS/0075	Nutts Corner Enterprise Park (One2One Planning)	DM 1	Nutts Corner Enterprise Park considers the Plan lacks flexibility to manage the planned growth of approximately 9,000 new jobs.	<p>The inclusion of business use class (B1) within the range of acceptable uses would assist in providing this flexibility.</p> <p>Allow for exceptions which can contribute to the job creation potential. Policy should contain more flexibility where the use has ceased and should allow temporary or meanwhile uses to take place.</p>	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Policy DM 1.1 should be read alongside Policy SP 2.</p> <p>Policy SP 2.5 states that precise boundaries of SELs will be brought forward at the LPP.</p> <p>The Council considers that the assessment of proposals for temporary or meanwhile uses is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.</p>
LA03/DPS/0075	Nutts Corner Enterprise Park (One2One Planning)	Monitoring	Nutts Corner Enterprise Park considers the Plan lacks detail on how Nutts Corner Strategic Employment Location delivery will be monitored to show if the intended job creation is being achieved.	No specified modification.	No change required. Chapter 14 of the DPS sets out an Indicative Monitoring Framework for the LDP. This includes the outcome of "innovation and investment will be encourages with growth of up to 9,000 new jobs by 2030" and a set of indicators.
LA03/DPS/0076	Sinn Fein	SP 4	Sinn Fein considers that the housing growth figure substantially underestimates the housing need in the Borough. It is a significant reduction in previous growth estimates and significantly reduced from previous growth levels seen in the area in previous years, and does not take into account the severe need in the neighbouring area of North Belfast.	The plan should revert to the previous estimate of 13,500 new homes over the period of the plan.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.
LA03/DPS/0077	Jim Gregg	SP 3	Mr. Jim Gregg notes the Borough's lack of public rail network connectivity, a lack of rail halts, and in particular a dedicated rail link to BIA.	No specified modification.	<p>Noted.</p> <p>The Council will continue to work with its statutory partners and DfI Transport with regard to the viability of future transportation schemes (including cross boundary issues). The Council will also continue to engage with DfI Transport as it brings forward its new suite of Transport Plans.</p>

LA03/DPS/0077	Jim Gregg	SP 3	Mr. Jim Gregg makes a general statement regarding the historic housing development growth of Antrim. Considered to be over development, lacking in aesthetic quality, landscaping and open space provision. Considers this over development has contributed to traffic congestion and parking issues. Notes the historic lack of supporting pedestrians/cycle linkages, particularly within the environs of the carriageway at Junction One/Stiles Way, Antrim for those with mobility issues.	No specified modification.	No change required. The Council considers that the assessment of proposals for Homes and Transport is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0077	Jim Gregg	DM 25	Mr. Jim Gregg would like to see more business/industrial parks across the Borough, with a mix of units and landscaping which are sympathetic to (or do not detract from) the character of the countryside.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council is committed to the promotion of good design and layout, and sustainable development. Policies SP 6 Placemaking and Good Design, DM 25 Urban Design and DM 26 Rural Design and Character demonstrates the Council's commitment to promoting good standards of design, layout and landscaping. The Council will also consider the role of key site requirements at the Local Policies stage in relation to new employment zonings.
LA03/DPS/0077	Jim Gregg	SP 8	Mr. Jim Gregg notes the Plan's omission of the 18th and 19th Century industrial heritage of Antrim, Doagh and Ballyclare. Notes that the purpose of the Plan is to protect, restore and enhance these assets. Identifies the ongoing loss of ancient woodland to new developments.	No specified amendment.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the Strategic Policy is provided in the text "Why we have taken this approach". Evidence Paper 7: Historic Environment Paragraph 10.2 (page 22) refers to Industrial Heritage and notes that whilst many industrial sites do not have a regional designation, such sites can be considered of local importance to the Borough. The Council considers development proposals that may involve the loss of ancient woodland is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other considerations.
LA03/DPS/0077	Jim Gregg	SP 8	Mr. Jim Gregg considers that indigenous wildlife is continually displaced and in many cases eradicated. Questions what the Plan is doing to protect and enhance local species in the Borough. The Six Mile Valley should be considered a natural Green Way, developed for the protection of local wildlife.	To designate The Six Mile Valley a Green Way.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the Strategic Policy is provided in the text "Why we have taken this approach". Due to the site specific nature of this issue, this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0077	Jim Gregg	DM 50	Mr. Jim Gregg considers the Plan does little to address pollution including air, land and water (including litter). Questions if air pollution is monitored in the Borough and raises the issue of pollution of our natural rivers and streams from poor sewage disposal, industrial discharges and agricultural impacts.	The Plan should be more proactive in protecting the Six Mile Valley from general pollution.	No change required. The Council considers the Policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the Plan responds in a robust way to pollution and this is reflected the wording contained within the DPS Vision, Strategic Objectives, Strategic Policy and Development Management policy. The Council considers that the assessment of proposals to address general pollution is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations. Air pollution is currently monitored by the Council's strategic partner the Department of Agriculture, Environment and Rural Affairs (DAERA) - Air Information Resource. Water pollution management is also the responsibility of DAERA.
LA03/DPS/0077	Jim Gregg	SP 10	Mr. Jim Gregg has requested a specific Rivers Policy to be included in the forthcoming draft LPP.	Request for a Rivers Policy to be included in the Council's LDP.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The policies allow for flexibility. All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. It is clear when all of the plan is read together there is sufficient policy for the natural environment which includes rivers.
LA03/DPS/0078	Racarbry Developments (Turley)	Plan Vision	Racarbry Developments offer their support for the ambition and drive of the Council's DPS Vision.	No specified modification.	Support noted and welcomed.
LA03/DPS/0078	Racarbry Developments (Turley)	SP 1	Racarbry Developments considers that the Spatial Growth Strategy Policy SP 1.6 has failed to take account of the RDS and other planning strategies which identified the growth potential of Crumlin and critically its inclusion within the BMA travel to work corridor. There is a locational specific need which has been ignored in relation to Crumlin in the Spatial Growth Strategy. Evidence has been ignored including the RDS, BMA Travel to Work Area, and the Antrim, Ballymena and Larne Area Plan 2016 Issues Paper (DfI, 2001). It is considered that the role of Crumlin should be for growth rather than consolidation.	That the Council reconsiders the approach taken to Crumlin.	No change required. The Council considers that the policy as drafted (including the Spatial Growth Strategy) is appropriate and reasonable and has taken account of the provisions of the RDS (see para 7.17) and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach", with specific reference to para 4.4.

LA03/DPS/0078	Racarbry Developments (Turley)	SP 4	<p>Racarbry Developments considers that the housing growth allocation is unrealistic as it has not been informed by robust evidence and in its current form, has no mechanisms by which it is able to adapt to changing and unforeseen circumstances.</p> <p>It is flawed as it fails to take account of other statistical data and assessments including (1) rising build rates, (2) the diminishing plan period, and (3) Housing Market Analysis, which are required when formulating the final housing requirement.</p> <p>Consideration should be given as to whether the objectives of the housing policies can be met within the identified housing growth figure of 9,750 units.</p>	<p>A robust evidence base should be prepared, which includes a Housing Market Area assessment and robust urban capacity analysis, to support the housing growth figure.</p>	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p>
LA03/DPS/0078	Racarbry Developments (Turley)	DM 17	<p>Racarbry Developments indicate their support for the inclusion of affordable homes, Policy DM 17.3. However, they raise concerns regarding the lack of a definition of affordable housing.</p> <p>Considers there is no evidence presented in relation to supporting the threshold for affordable housing and whether alternative thresholds were considered. Additionally no details are provided to confirm that the proposed threshold provides for a reasonable profit level to be secure by developer.</p>	<p>Include a definition within the policy amplification to clearly identify the two primary forms of tenure, while at the same time acknowledging that the definition may be subject to change.</p> <p>Should review evidence base to support the proposed policy threshold of 10% and whether any viability testing was undertaken to inform/support the policy threshold.</p>	<p>Support for Policy DM 17 noted and welcomed.</p> <p>Whilst the DPS does not make specific reference to a definition of Affordable Housing, the SPPS as well as Evidence Paper 6 para. 6.3 identifies that affordable housing is defined as social rented housing and intermediate housing for eligible households. The Council considers that given the current review of the definition of Affordable Housing it would prove difficult to identify a definition in the DPS.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>
LA03/DPS/0078	Racarbry Developments (Turley)	SP 4	<p>Racarbry Developments notes para. 7.14 of the DPS, however are unaware of any assessment undertaken to determine whether zoned sites and/or windfall sites are suitable, available or viable for residential development. Details contained in Evidence Paper 6: Housing quantifies the potential level of available housing land from windfall but no assessment of the constraints or site specific issues which may impact on delivery.</p> <p>Requests the Council to keep an open mind as to whether new lands are required as this can only be answered following a complete and robust analysis.</p>	<p>The Council should give consideration to collating further statistical data to inform their assessment of the overall number of homes required, including a Housing Market Area assessment. Requests for a robust urban capacity analysis to be undertaken.</p>	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming LPP. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0078	Racarbry Developments (Turley)	Site Specific	<p>Racarbry Developments requests subject lands be considered for housing development: Crumlin.</p>	<p>Inclusion/zoning of land for development.</p>	<p>Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p>
LA03/DPS/0079	Vaughan Homes (TSA Planning)	SP 4	<p>Vaughan Homes considers the current housing growth figure is too restrictive when considering the LDP timetable and potential change in circumstances prior to the adoption of the LPP.</p> <p>Notes the flexible approach taken by the Council in respect of economic development land and advocates a similar approach should also be adopted in respect of housing growth to allow for adequate flexibility in light of any change in circumstances.</p>	<p>Amend the overall housing growth figure to at least 11,050 units for the period to 2032.</p>	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming LPP, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p> <p>The plan period relating to the entire DPS runs from 2015 to 2030 and the Council can see no reason to extend the period to 2032.</p>
LA03/DPS/0079	Vaughan Homes (TSA Planning)	SP 4	<p>Vaughan Homes agrees with the proportional housing allocation of 40% of total housing growth figure to Metropolitan Newtownabbey.</p>	<p>No specified modification.</p>	<p>Support noted and welcomed.</p>
LA03/DPS/0079	Vaughan Homes (TSA Planning)	Site Specific	<p>Vaughan Homes requests subject lands NOT to be considered for employment lands: Mallusk.</p> <p>When assessing the future development of the subject site, this demonstrates a distinct oversupply of employment land. This must be re-evaluated in order to ensure lands can be developed in accordance with the greatest local need, i.e. housing.</p>	<p>Exclusion of lands from South of Antrim Road SEL.</p>	<p>It is considered that this is a site-specific matter to be dealt with at the LPP stage which will deal with settlement limits, site designations/boundaries and the zoning of land.</p> <p>A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>

LA03/DPS/0079	Vaughan Homes (TSA Planning)	Site Specific	Vaughan Homes raises the issue of uncommitted housing zonings which may not be available or achievable, particularly if they have been zoned for a long period of time. Considers the evidence to support the inclusion of uncommitted housing zonings as remaining yield, has not been sufficiently reviewed.	No specified modification.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0079	Vaughan Homes (TSA Planning)	Site Specific	Vaughan Homes requests subject lands should be re-zoned from employment land to housing: Metropolitan Newtownabbey	Re-zoning of land.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0079	Vaughan Homes (TSA)	Miscellaneous	Vaughan Homes considers that as the publication of the DPS and consultation period is 6 to 9 months behind schedule, it is therefore reasonable to anticipate that the full adoption of the Plan will be delayed past the March 2024 timeframe. This could result in less than 5 years between the adoption of the Plan and the end of the Plan period. Given these delays and therefore the limited time for review and amendment of the Plan prior to 2030, Vaughan Homes believe it would be appropriate to include a housing growth figure to 2032 to allow for adequate flexibility and time to review in the event of a newly amended timetable.	No specified modification.	No change required. The DPS has been published within its published Timetable which will be kept under review. A new LDP Timetable was published in October 2020. The LDP period does not need to be extended to 2032 in order to maintain/deliver a 5 year housing supply as current evidence indicates there is a more than adequate supply of deliverable housing across the Borough.
LA03/DPS/0080	Errigal Contracts (TSA Planning)	Strategic Objectives	Errigal Contracts fully support Strategic Objectives 2-4 .	No specified modification.	Support noted and welcomed.
LA03/DPS/0080	Errigal Contracts (TSA)	SP 1	Errigal Contracts concur with Policy SP 1.6 Spatial Growth Strategy, as it focuses growth towards both Metropolitan Newtownabbey and the major Hub Town of Antrim. Welcomes continued emphasis with the DPS of Antrim playing both a local and regionally significant role, focusing development efforts sustainably towards the main hubs first in line with the RDS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0080	Errigal Contracts (TSA Planning)	SP 2	Errigal Contracts are supportive of Policy SP 2.9 relating to the identification of Local Employment Sites.	No specified modification.	Support noted and welcomed.
LA03/DPS/0080	Errigal Contracts (TSA Planning)	SP 4	Errigal Contracts considers that the current housing growth figure is too restrictive when considering the LDP timetable and potential change in circumstances prior to the adoption of the LPP.	Amend overall housing growth figure to at least 11,050 units for the period to 2032.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming LPP, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy. The plan period relating to the entire DPS runs from 2015 to 2030 and the Council can see no reason to extend the period to 2032. A new LDP Timetable was published in October 2020.
LA03/DPS/0080	Errigal Contracts (TSA Planning)	SP 4	Errigal Contracts agrees with the proportional housing allocation of 28.2% of the housing growth figure to Antrim, although considers this should be updated in line with the revised total housing growth figure as proposed.	Increase the housing allocation to Antrim to 3,116 units.	Support noted and welcomed. No change required to the housing allocation for Antrim as the Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.
LA03/DPS/0080	Errigal Contracts (TSA Planning)	Site Specific	Errigal Contracts considers that Antrim Business Park should be considered and protected as a Local Employment Site.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the LPP stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.

LA03/DPS/0080	Erigal Contracts (TSA Planning)	Site Specific	Erigal Contracts requests subject lands are considered for industrial/economic development: Antrim.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the LPP stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0080	Erigal Contracts (TSA Planning)	Site Specific	Erigal Contracts requests subject lands are considered for a mixed use scheme comprising a business park and residential dwellings.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the LPP stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0080	Erigal Contracts (TSA Planning)	Site Specific	Erigal Contracts notes Table 12 of Evidence Paper 6: Housing which states that total committed residential units in Antrim is 3,233 units. States that this figure includes uncommitted zonings and considers that these may not be available or achievable, particularly if they have been zoned for a long period of time. Considers that evidence to support this has not been sufficiently reviewed within each settlement.	No specified modification.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming LPP. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming LPP, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0081	James Hamill	SP 1	Table 1: Places of our Borough: Mr James Hamill considers the proposed classification of Ballyclare as a Large Town is a downgrade both in terms of title and status. Considers it would have ramifications for the future investment of Ballyclare.	No specified modification, but indicates that a coherent and uniform approach should be taken to the identification of towns and town types in the Borough.	No change required. The Council considers that the classification of Ballyclare as a Large Town outlined in Table 1 'The Places of our Borough' of Policy SP 1 is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the Strategic Policy is provided in the text, "Why we have taken this approach". Evidence Paper 2: Settlement Evaluation informs the classification of settlements set out in the DPS. The Council recognises that Ballyclare is the third largest settlement in the Borough and with a wide range of services and infrastructure available. Therefore, it is defined in the third tier of the settlement hierarchy as a Large Town. The Council's position regarding Ballyclare is clearly set out in paragraphs 8.16-8.22 and pages 45-48 of this Evidence Paper. This should be read for information.
LA03/DPS/0081	James Hamill	SP 2	Mr. James Hamill objects to the Abbey Centre being classified as a Large Town Centre. Considers there is not sufficient supporting evidence for this and that the approach taken does not sufficiently align with the SPPS. Considers this is an out of town shopping centre and that there is no housing to support the proposed town centre designation. As a consequence, Mr. Hamill considers this aspect of the DPS could have negative implications for existing, established town centres across the Borough.	No specified modification, but considers the Plan Strategy should avoid the classification of a commercially owned, out of town retail shopping centre (the Abbey Centre) as any form of town. This is to prevent the morphing from existing bulky items and retail use to mixed use, leisure etc. where traditional towns are better suited.	No change required. The Council considers that the classification of Abbey Centre as a Large Town Centre outlined in Table 4 'Antrim and Newtownabbey Retail Hierarchy' of Strategic Policy 2 is appropriate and reasonable. The Council's rationale for the hierarchy of retail centres proposed within the Borough is set out in Evidence Paper 4: Retail and Commercial Leisure Study. Whilst this acknowledges that the Abbey Centre is not a Town Centre in the traditional sense, it nevertheless supports its designation as a tier 1 centre as there are sound planning and sustainability reasons to do so, not least the role currently played by the Centre as the physical heart of Metropolitan Newtownabbey. It further highlights that such a designation will assist in diversifying its future role and function and suggests preparation of a Masterplan to assist this approach, a matter the Council would intend taking forward at the LPP stage.
LA03/DPS/0082	Flaxall Holdings Ltd (Farmingham Planning Ltd)	SP 1	Flaxall Holdings Ltd. supports the designation of Ballyclare as a Large Town.	No specified modification.	Support noted and welcomed.
LA03/DPS/0083	Flaxall Holdings Ltd (Farmingham Planning Ltd)	SP 4	Flaxall Holdings Ltd. considers that there are potential issues in relation to the delivery of existing approved housing in Ballyclare, with particular reference to the large scale growth proposed to the west of the town which relies on provision of Phase 2 of the developer funded Ballyclare Relief Road. Advises that the level of housing growth allocated to Ballyclare therefore needs to be increased.	No specified modification, but seeks an increase in the level of housing growth allocated to Ballyclare.	No change required. It is considered that the 1,100 unit housing allocation proposed for Ballyclare is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Ballyclare. The Council also took into consideration comments raised in the DfI response to the POP consultation. It is considered that an increase in the overall housing allocation to Ballyclare would be at odds with the considerations identified above. A representation (LA03-DPS-0088) by the developers of the Relief Road site has indicated that the lands benefit from extant planning permissions and that they are committed to developing these lands, including the Ballyclare Relief Road, within the anticipated plan period. The DPS's evidence base for the housing allocation for Ballyclare is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.

LA03/DPS/0083	Flaxall Holdings Ltd (Farningham Planning Ltd)	Site Specific	<p>Flaxall Holdings Ltd. considers that meaningful progress on much of the housing land to the west of Ballyclare is some years off as this relies on Phase 2 of the Ballyclare Relief Road to be constructed.</p> <p>Indicates that additional housing is required to be allocated in Ballyclare to allow for the very real risk that the current major allocations to the west of the settlement, that are predicated on the provision of the relief road, fail to come forward in the timescale envisaged.</p> <p>Highlights that there is a need for the Plan Strategy to be written in a way that allows for Ballyclare's settlement boundary to be altered in the future to help facilitate replacement/supplementary housing elsewhere whilst acknowledging that the location of such additional land would be a matter for the Local Polices Plan.</p>	No specified modification, but indicates that the draft Plan Strategy should be written to incorporate flexibility for its future settlement limit and to incorporate additional housing zoning should the need arise.	<p>No change required. It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan.</p> <p>A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0084	Davelle Developments Ltd (TSA Planning)	SP 4	<p>Davelle Developments considers that the current housing growth figure is too restrictive when considering the LDP timetable and potential change in circumstances prior to the adoption of the Local Policies Plan.</p> <p>Notes the flexible approach taken by the Council in respect of economic development land and advocates a similar approach should also be adopted in respect of housing growth to allow for adequate flexibility in light of any change in circumstances.</p>	Amend overall housing growth figure to at least 11,050 units for the period to 2032.	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p> <p>The plan period relating to the entire DPS runs from 2015 to 2030 and the Council can see no reason to extend the period to 2032.</p>
LA03/DPS/0084	Davelle Developments Ltd (TSA Planning)	SP 4	<p>Davelle Developments considers that the needs of specific settlements do not appear to have formed part of the allocation process. DPS has not taken sufficient account of sustainable development; has not analysed availability of housing lands; and the NIHE Housing Needs Assessment, when allocating growth. There has been an over allocation to hamlets at the expense of villages which is restrictive and not in line with the Spatial Growth Strategy or other policies to promote sustainable development. Allocation to Crumlin and Randalstown is unrealistic and inappropriate and the allocation to the countryside is not realistic.</p> <p>Provides an amended housing allocation across the Borough (table 7 of submission) which they consider represents a more sound, sustainable and balanced split than that identified in the DPS. This indicates a reduced proportion of housing growth to Antrim and Ballyclare, as well as the hamlets and the countryside while increasing the proportion for Crumlin and Randalstown and the villages of the Borough.</p>	<p>Amend housing allocation in accordance with table 7 of submission.</p> <p>Amend para. 7.10 to reference that allocations have also been informed by housing need within settlements.</p>	<p>No change required. It is considered that the housing allocation is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of settlements. It is considered that an increase in the overall housing allocation would be at odds with the considerations identified above.</p> <p>The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Settlement Evaluation. These documents should be read for further information.</p>
LA03/DPS/0084	Davelle Developments Ltd (TSA Planning)	SP 4	Davelle Developments considers there is an overemphasis on excess of existing housing commitments, as evidence is not sufficiently robust. Committed sites have not been sufficiently interrogated to ensure they are adequate and available. No consultation with landowners to assess deliverability over the plan period, and therefore this supply is over presumptuous.	Remove reference in para. 7.13 and 7.14 to an excess/ample supply of committed housing sites and replace with a commitment to carry out additional analysis, including consultation with landowners, which will inform the need and location of additional lands at Local Policies Plan stage.	<p>No change required. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. The Council considers that this provides clear evidence at a strategic level on the amount of committed housing across the Borough to inform both the Spatial Growth Strategy and the Homes section of the DPS.</p> <p>A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0084	Davelle Developments Ltd (TSA Planning)	Site Specific	Davelle Developments analysis of housing land availability indicates that there is a remaining yield of 3 dwellings in Ballyrobert, which differs from that presented by the Council in Evidence Paper 6: Housing.	No specified modification	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p> <p>The Council notes that the representation contains a number of figures which differ from those published in Evidence Paper 6: Housing. The Council considers that the parameters used by the objector may differ from those employed by the Council in the respective studies and therefore explain the variation. For example, the base date of each study and what is determined to be a 'completed' unit may differ.</p>

LA03/DPS/0084	Davelle Developments Ltd (TSA Planning)	Site Specific	Davelle Developments request subject lands be considered for housing development: Ballyrobert.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0084	Davelle Developments Ltd (TSA)	Miscellaneous	Davelle Developments consider that given the publication of the Draft Plan Strategy and consultation period is currently 6 to 9 months behind schedule, they feel it is reasonable to anticipate that the full adoption of the Plan will be delayed past the March 2024 timeframe. This could result in less than 5 years between the adoption of the Plan and the end of the Plan period. Given these delays and therefore the limited time for review and amendment of the Plan prior to 2030, we believe it would be appropriate to include a housing growth figure to 2032 to allow for adequate flexibility and time to review in the event of a newly amended timetable.	No specified modification	No change required. The DPS has been published within its published Timetable which will be kept under review. A new Timetable was published in October 2020. The LDP period does not need to be extended to 2032 in order to maintain/deliver a 5 year housing supply as current evidence indicates there is a more than adequate supply of deliverable housing across the Borough.
LA03/DPS/0085	Moy Park (Clyde Shanks)	SP 1	Moy Park acknowledges the Plan's proposed Spatial Growth Strategy and advocates the Council's intentions to strengthen the role of Belfast International Airport as a Regional Gateway and to recognise the importance of Nutts Corner as a strategic location of employment on the Regional Strategy Transport Network.	No specified modification.	Support noted and welcomed.
LA03/DPS/0085	Moy Park (Clyde Shanks)	SP 2	Moy Park advocates the Council's intention to designate Nutts Corner as a SEL.	No specified modification.	Support noted and welcomed.
LA03/DPS/0085	Moy Park (Clyde Shanks)	Site Specific	Moy Park requests subject lands be considered for inclusion within SEL designation: Nutts Corner.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0086	Driver & Vehicle Agency (DVA)	DM 1	The DVA welcome and support Policy DM 1 and consider that the proposed development of a new DVA Test Centre on lands within the South of Antrim Road, Mallusk SEL will not lead to significant diminution of zoned employment lands. DVA considers that Policy DM 1 meets soundness tests C4 and CE 4.	No specified modification.	Support noted and welcomed.
LA03/DPS/0087	Bulrush (Clyde Shanks)	SP 9	Bulrush advocate the Council's position not to designate Areas of Mineral Constraint within the LDP.	No specified modification.	Support noted and welcomed.
LA03/DPS/0087	Bulrush (Clyde Shanks)	DM 43	Bulrush advocates the Council's general support for mineral developments that address the matters identified in Policy DM 43.2.	No specified modification.	Support noted and welcomed.

LA03/DPS/0088	Neptune Group (Clyde Shanks)	SP 1	<p>The Neptune Group supports the proposed Spatial Growth Strategy that acknowledges the committed development allocations within Ballyclare and seeks to consolidate and strengthen its role as a large town.</p> <p>Considers that this is consistent with BMAP and RDS, given Ballyclare's strategic location within easy commuting distance of Belfast and its role as a service centre for a substantial hinterland that includes a number of villages and hamlets including Doagh, Straid, Burnside, Ballyeaston, Ballycorr and Hillhead.</p>	No specified modification.	Support noted and welcomed.
LA03/DPS/0088	Neptune Group (Clyde Shanks)	SP 4	<p>The Neptune Group indicate support for the Councils acknowledgement that a critical consideration in bringing forward future housing zonings will be those committed housing sites in the main settlements, including Ballyclare. Confirms the clients ongoing commitment to develop their lands on the western side of Ballyclare.</p> <p>Notes that original permissions for the subject lands identified that 2,250 dwellings could be accommodated on subject lands, however following initial capacity assessments identifies a more realistic expectation is closer to 1,600 dwelling capacity.</p>	No specified modification	Support noted and welcomed.
LA03/DPS/0089	Ivan Jackson (Clyde Shanks)	SP 4	<p>Mr. Jackson recommends that the allocation should maintain a 5 year housing land supply as originally proposed at POP stage, in order to facilitate an adequate and available supply of housing at the end of the plan period.</p> <p>Alternatively, given that the progress of LDP publication is not in line with the proposed timetable and it's likely the LPP will not become adopted until quarter 4 2025/26. This will only allow a shelf life of four years before the plan expires. Therefore the Plan period should be extended to at least 2031 which will also for a minimum of 5 years to pass before the 5 year review/monitoring period commenced. Not to do either could potentially leave the council exposed with a shortfall of available housing land at the end of the plan period.</p>	Maintain the 5 year housing land supply as proposed in the POP document. Or alternatively extend the plan period to at least 2031.	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>The LDP process affords greater flexibility in the planning process by incorporating provisions for 5 years reviews and this will enable the Council to adapt the Plan in response to changing needs in circumstances, both regionally and locally. The Council is required to prepare an Annual Monitoring Report that will help inform whether change is required. Accordingly if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.</p> <p>No change required. The DPS has been published in accordance with the Timetable. It will be kept under review. A new Timetable was published in October 2020. The Plan period does not need to be extended to 2031 to deliver a 5 year housing supply as there is already an adequate supply of housing in the Borough.</p> <p>The Plan will be reviewed every 5 years and if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.</p>
LA03/DPS/0089	Ivan Jackson (Clyde Shanks)	Site Specific	<p>Mr. Jackson indicates that whilst it is accepted that the Council are not intending to undertake any de-zoning, considers it cannot be guaranteed that existing zoning identified in legacy plans will come forward either due to deliverability issues, market conditions and/or land owner appetite.</p> <p>Considers that many of the existing housing zonings do not come forward for development as illustrated by Table 12 of Evidence Paper 6: Housing where approximately 2,000 units on uncommitted zonings in the Antrim Area Plan 1984-2001 have not come forward for development and therefore are very unlikely to contribute to housing growth in the plan period.</p>	To ensure that there will be available remaining capacity at the end of the plan period, give consideration to re-incorporating the 5 year housing land supply.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0089	Ivan Jackson (Clyde Shanks)	Site Specific	Mr. Jackson requests subject lands be considered for housing development: Ballynure.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0090	JFM Construction Ltd (Clyde Shanks)	SP 1	JFM Construction welcome the reclassification of Randalstown from a Local Town to a Town, in the proposed settlement hierarchy. Considers it is imperative to recognise the growing service/function of Randalstown in line with Policy SP 1.6(c).	No specified modification.	Support noted and welcomed.

LA03/DPS/0090	JFM Construction Ltd (Clyde Shanks)	SP 4	<p>JFM Construction recommend that the allocation should maintain a 5 year housing land supply as originally proposed at POP stage, in order to facilitate an adequate and available supply of housing at the end of the plan period.</p> <p>Alternatively, given that the progress of LDP publication in not in line with the proposed timetable and it's likely the LPP will not become adopted until quarter 4 2025/26. This will only allow a shelf life of four years before the plan expires. Therefore the Plan period should be extended to at least 2031 which will also for a minimum of 5 years to pass before the 5 year review/monitoring period commenced. Not to do either could potentially leave the council exposed with a shortfall of available housing land at the end of the plan period.</p>	<p>Maintain the 5 year housing land supply as proposed in the POP document. Or alternatively extend the plan period to at least 2031.</p>	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>The LDP process affords greater flexibility in the planning process by incorporating provisions for 5 years reviews and this will enable the Council to adapt the Plan in response to changing needs in circumstances, both regionally and locally. The Council is required to prepare an Annual Monitoring Report that will help inform whether change is required. Accordingly if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.</p> <p>No change required. The DPS has been published in accordance with the Timetable. It will be kept under review. A new Timetable was published in October 2020. The Plan period does not need to be extended to 2031 to deliver a 5 year housing supply as there is already an adequate supply of housing in the Borough.</p> <p>The Plan will be reviewed every 5 years and if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.</p>
LA03/DPS/0090	JFM Construction Ltd (Clyde Shanks)	Site Specific	<p>JFM Construction indicate that whilst it is accepted that the Council are not intending to undertake any de-zoning, considers it cannot be guaranteed that existing zoning identified in legacy plans will come forward either due to deliverability issues, market conditions and/or land owner appetite. Considers that any of the existing housing zonings do not come forward for development as illustrated by Table 12 of Evidence Paper 6: Housing where approximately 2000 units on uncommitted zonings in the Antrim Area Plan 1984-2001 have not come forward for development and therefore are very unlikely to contribute to housing growth in the plan period. Questions the assertion of the current capacity of Randalstown as there is very likely to be concerns about deliverability.</p>	<p>To ensure that there will be available remaining capacity at the end of the plan period, give consideration to re-incorporating the 5 year housing land supply.</p>	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0090	JFM Construction Ltd (Clyde Shanks)	Site Specific	<p>JFM Construction request subject lands be considered for housing development: Randalstown</p>	<p>Inclusion/zoning of land for development.</p>	<p>Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p>
LA03/DPS/0091	Wilson Jackson (Clyde Shanks)	SP 4	<p>Mr. Jackson recommends that the allocation should maintain a 5 year housing land supply as originally proposed at POP stage, in order to facilitate an adequate and available supply of housing at the end of the plan period.</p> <p>Alternatively, given that the progress of LDP publication in not in line with the proposed timetable and it's likely the LPP will not become adopted until quarter 4 2025/26. This will only allow a shelf life of four years before the plan expires. Therefore the Plan period should be extended to at least 2031 which will also for a minimum of 5 years to pass before the 5 year review/monitoring period commenced. Not to do either could potentially leave the council exposed with a shortfall of available housing land at the end of the plan period.</p>	<p>Maintain the 5 year land supply as proposed at POP. Or alternatively extend the plan period to at least 2031.</p>	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>The LDP process affords greater flexibility in the planning process by incorporating provisions for 5 years reviews and this will enable the Council to adapt the Plan in response to changing needs in circumstances, both regionally and locally. The Council is required to prepare an Annual Monitoring Report that will help inform whether change is required. Accordingly if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.</p> <p>No change required. The DPS has been published in accordance with the Timetable. It will be kept under review. A new Timetable was published in October 2020. The Plan period does not need to be extended to 2031 to deliver a 5 year housing supply as there is already an adequate supply of housing in the Borough.</p> <p>The Plan will be reviewed every 5 years and if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.</p>
LA03/DPS/0091	Wilson Jackson (Clyde Shanks)	Site Specific	<p>Mr. Jackson indicates that whilst it is accepted that the Council are not intending to undertake any de-zoning, considers it cannot be guaranteed that existing zoning identified in legacy plans will come forward either due to deliverability issues, market conditions and/or land owner appetite. Considers that many of the existing housing zonings do not come forward for development as illustrated by Table 12 of Evidence Paper 6: Housing where approximately 2,000 units on uncommitted zonings in the Antrim Area Plan 1984-2001 have not come forward for development and therefore are very unlikely to contribute to housing growth in the Plan period.</p>	<p>To ensure that there will be available remaining capacity at the end of the plan period, give consideration to re-incorporating the 5 year housing land supply.</p>	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>

LA03/DPS/0091	Wilson Jackson (Clyde Shanks)	Site Specific	Mr. Jackson requests subject lands be considered for housing development: Ballynure.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0092	Toland House Properties Ltd (Turley)	Plan Vision	Toland House Properties welcome and broadly support the Vision but the Plan period should be extended to 2035. It is anticipated that the LLP part of the Plan will not be adopted until the end of 2023/2024. This is unrealistic and would leave only four or five years of a plan period to 2030. A longer plan period to 2035 is required to increase the potential for the plan to take account of the RDS and achieve its own Spatial Growth Strategy (a). Also risk of needing to identify additional lands if any shortfall.	Extend plan period to 2035.	Support is noted and welcomed. No change required. The DPS has been published in accordance with the Timetable. It will be kept under review. A new Timetable was published in October 2020. The Plan period does not need to be extended to 2035 to deliver a 5 year housing supply as there is already an adequate supply of housing in the Borough. The Plan will be reviewed every 5 years and if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.
LA03/DPS/0092	Toland House Properties Ltd (Turley)	Strategic Objectives	Toland House Properties support Strategic Objectives 1-14 (SO 8 in particular).	No specified modification	Support noted and welcomed.
LA03/DPS/0092	Toland House Properties Ltd (Turley)	SP 1	Toland House Properties support Policy SP 1 and particularly Spatial Growth Strategy Policy SP 1.6 (a), focusing core growth in the major hub town of Antrim, strengthening its role.	No specified modification.	Support noted and welcomed.
LA03/DPS/0092	Toland House Properties Ltd (Turley)	SP 4	Toland House Properties consider the proposed level of housing growth within the DPS does not take sufficient account of the RDS and has the potential to undermine the Spatial Growth Strategy Policy SP 1.6 (a). Considers that if the allocation of housing was increased, such an extension would allow flexibility and help the plan achieve its stated objectives around focusing growth on Metropolitan Newtownabbey and Antrim.	Increase the housing growth figure by 3,250 units as previously indicated within the POP.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.
LA03/DPS/0092	Toland House Properties Ltd (Turley)	SP 4	Toland House Properties consider the Housing Allocation across the Borough under allocates to largest the settlements with potential to undermine the Spatial Growth Strategy which focusses growth in Metropolitan Newtownabbey and Antrim. The Housing Allocation does not take account of the RDS in directing a sufficient scale of growth to these settlements.	Metropolitan Newtownabbey and Antrim should receive the majority of the proposed additional allocation. (3,250 units)	No change required. The Council does not consider that an increase in the overall housing allocation for the Borough is required. In this context, it is considered that the 2,750 unit housing allocation proposed for Antrim (which constitutes 28.2% of the overall growth allocation) is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Antrim. The DPS's evidence base for the housing allocation to Antrim is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth, These documents should be read for further information.
LA03/DPS/0092	Toland House Properties Ltd (Turley)	SP 4	Toland House Properties consider the Housing Allocation across the Borough under allocates to largest the settlements with potential to undermine the Spatial Growth Strategy which focusses growth in Metropolitan Newtownabbey and Antrim. The Housing Allocation does not take account of the RDS in directing a sufficient scale of growth to these settlements.	Metropolitan Newtownabbey and Antrim should receive the majority of the proposed additional allocation. (3,250 units)	No change required. The Council does not consider that an increase in the overall housing allocation for the Borough is required. In this context, it is considered that the 3,900 unit housing allocation proposed for Metropolitan Newtownabbey (which constitutes 40% of the overall growth allocation) is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Metropolitan Newtownabbey. The DPS's evidence base for the housing allocation to Metropolitan Newtownabbey is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.

LA03/DPS/0092	Toland House Properties Ltd (Turley)	SP 4	<p>Toland House Properties consider that a more robust evidence base should be prepared to ensure that the housing supply is effective. All information should be made publicly available for review and consideration.</p> <p>Notes para. 7.14 of the DPS, however are unaware of any assessment undertaken to determine whether zoned sites and/or windfall sites are suitable, available or viable for residential development. Details contained in Evidence Paper 6: Housing quantifies the potential level of available housing land from windfall but no assessment of the constraints or site specific issues which may impact on delivery.</p> <p>Urge Council to keep an open mind as to whether new lands are required as this can only be answered following a complete and robust analysis.</p>	<p>A Strategic Housing Market Analysis should be undertaken to inform the final housing requirement for the area but also to consider the types and tenure of housing required.</p> <p>A robust urban capacity analysis of identified sites (zoned and windfall) should be carried out and consideration given to infrastructure constraints.</p>	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0092	Toland House Properties Ltd (Turley)	Site Specific	<p>Toland House Properties request subject lands be considered for housing development: Antrim.</p>	<p>Inclusion/zoning of land for development.</p>	<p>Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p>
LA03/DPS/0092	Toland House Properties Limited (Turley)	Miscellaneous	<p>Toland House Properties consider that the DPS has not been published in accordance with the Planning Act (Northern Ireland) 2011 - The latest version of LDP timetable dated July 2018 cites the publication of DPS in Q 4 2018/2019. In practice the DPS was published in Q2 2019/2020 4 months after the agreed date set out in the timetable.</p>	<p>Requests LDP Timetable to be amended.</p>	<p>No change required. The DPS was published in Q1 2019-2020. DfI advised all Councils that three months either side of the published date of a Timetable was acceptable. The Council met this target and will continue to keep the LDP Timetable under review. A new Timetable was published in October 2020.</p>
LA03/DPS/0092	Toland House Properties Limited (Turley)	Miscellaneous	<p>Toland House Properties consider that the DPS has not been published in accordance with The Planning (LDP) Regulations 2015. "Such documents as in the opinion of the council are relevant to the preparation of the LDP" should have included supporting evidence used to inform of support a draft policy.</p> <p>There is a gap in the information base and therefore the Plan has failed to address procedural test 4. There are gaps in the evidence base used to formulate the figure. Principally that there is statistical data together with the findings of housing market and urban capacity assessments which require closer analysis to inform the overall level of housing within the borough council area.</p>	<p>LDP Timetable to be updated.</p>	<p>No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.</p> <p>A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p>
LA03/DPS/0093	Toland House Properties Ltd (Turley)	Plan Vision	<p>Toland House Properties welcome and broadly support the Vision but the Plan period should be extended to 2035.</p> <p>It is anticipated that the LLP part of the Plan will not be adopted until the end of 2023/2024. This is unrealistic and would leave only four or five years of a plan period to 2030. A longer plan period to 2035 is required to increase the potential for the plan to take account of the RDS and achieve its own Spatial Growth Strategy (a). Also risk of needing to identify additional lands if any shortfall.</p>	<p>Extend plan period to 2035.</p>	<p>Support noted and welcomed.</p> <p>No change required. The DPS has been published in accordance with the Timetable. It will be kept under review. A new Timetable was published in October 2020. The Plan period does not need to be extended to 2035 to deliver a 5 year housing supply as there is already an adequate supply of housing in the Borough.</p> <p>The Plan will be reviewed every 5 years and if there is an unexpected shortfall in housing supply, a plan revision can be prepared to address this matter.</p>
LA03/DPS/0093	Toland House Properties Ltd (Turley)	Strategic Objectives	<p>Toland House Properties support Strategic Objective 1 - 14 (in particular SO 8).</p>	<p>No specified modification</p>	<p>Support noted and welcomed.</p>

LA03/DPS/0093	Toland House Properties Ltd (Turley)	SP 1	Toland House Properties support Policy SP 1 and the elevation of Dunadry as a village.	No specified modification.	Support noted and welcomed.
LA03/DPS/0093	Toland House Properties Ltd (Turley)	SP 4	Toland House Properties consider the proposed level of housing growth within the DPS does not take sufficient account of the RDS and has the potential to undermine the Spatial Growth Strategy Policy SP 1.6 (a). Considers that if the allocation of housing was increased, such an extension would allow flexibility and help the plan achieve its stated objectives around focusing growth on Metropolitan Newtownabbey and Antrim.	Increase the housing growth figure by 3,250 units as previously indicated within the POP.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth.
LA03/DPS/0093	Toland House Properties Ltd (Turley)	SP 4	Toland House Properties consider that the proposed housing allocation to Dunadry is too low. A modest increase in housing allocation to Dunadry is required to reflect the RDS, the Spatial Growth Strategy and its elevation in the settlement hierarchy.	Increase housing allocation to Dunadry.	No change required. It is considered that the 10 unit housing allocation proposed for Dunadry is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Dunadry. It is considered that an increase in the overall housing allocation to Dunadry would be at odds with the considerations identified above. The DPS's evidence base for the housing allocation to Dunadry is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0093	Toland House Properties Ltd (Turley)	SP 4	Toland House Properties consider that the evidence base suggests ineffective housing supply, as no houses have been completed in Dunadry since 2015 and therefore questions the deliverability of sites. Considers that a more robust evidence base should be prepared to ensure that the housing supply is effective. All information should be made publicly available for review and consideration. Notes para. 7.14 of the DPS, however are unaware of any assessment undertaken to determine whether zoned sites and/or windfall sites are suitable, available or viable for residential development. Details contained in Evidence Paper 6: Housing quantifies the potential level of available housing land from windfall but no assessment of the constraints or site specific issues which may impact on delivery. Urge Council to keep an open mind as to whether new lands are required as this can only be answered following a complete and robust analysis.	A Strategic Housing Market Analysis should be undertaken to inform the final housing requirement for the area but also to consider the types and tenure of housing required. A robust urban capacity analysis of identified sites (zoned and windfall) should be carried out and consideration given to infrastructure constraints.	No change required. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0093	Toland House Properties Ltd (Turley)	Site Specific	Toland House Properties request subject lands be considered for housing development: Dunadry.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0093	Toland House Properties Limited (Turley)	Miscellaneous	Toland House Properties consider that the DPS has not been published in accordance with the Planning Act (Northern Ireland) 2011 - The latest version of LDP timetable dated July 2018 cites the publication of DPS in Q 4 2018/2019. In practice the DPS was published in Q2 2019/2020 4 months after the agreed date set out in the timetable.	Requests LDP Timetable to be amended.	No change required. The DPS was published in Q1 2019-2020. DfI advised all Councils that three months either side of the published date of a Timetable was acceptable. The Council met this target and will continue to keep the LDP Timetable under review. A new Timetable was published in October 2020.

LA03/DPS/0093	Toland House Properties Limited (Turley)	Miscellaneous	<p>Toland House Properties welcome and broadly support the Vision but the Plan period should be extended to 2035.</p> <p>It is anticipated that the LLP part of the Plan will not be adopted until the end of 2023/2024. This is unrealistic and would leave only four or five years of a plan period to 2030. A longer plan period to 2035 is required to increase the potential for the plan to take account of the RDS and achieve its own Spatial Growth Strategy (a). Also risk of needing to identify additional lands if any shortfall.</p>	Requests LDP Timetable to be amended.	<p>Support noted and welcomed.</p> <p>No change required. The DPS has been published in accordance with the Timetable. It will be kept under review. A new Timetable was published in October 2020. The Plan period does not need to be extended to 2035 to deliver a 5 year housing supply as there is already an adequate supply of housing in the Borough.</p> <p>The Plan will be reviewed every 5 years and if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.</p>
LA03/DPS/0094	David Dalzell (Various Clients)	SP 2	Mr. Dalzell considers that some indication should be provided as to what will be deemed as an 'appropriate' farm diversification scheme (not necessarily a definitive list). Otherwise each proposal should be treated on a case by case basis on its merits.	Policy wording at (c) could say 'supporting the establishment of new or extended high quality holiday chalet, cabins, caravans and camping sites in appropriate locations'.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council considers that assessment of proposals for farm diversification schemes is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.</p>
LA03/DPS/0094	David Dalzell (Various Clients)	SP 2	Mr. Dalzell considers that the Policy wording at SP 2.15 (c) is unduly negative (particularly the word 'control'), and implies that such development may be undesirable or unsustainable.	Policy wording at (c) could say 'supporting the establishment of new or extended high quality holiday chalet, cabins, caravans and camping sites in appropriate locations'.	<p>No change required.</p> <p>The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on Page 11 and Paragraph 1.5.</p> <p>Policy SP 2.15 (c) should be read alongside Policies DM 2.4 Economic Development - Countryside (c) Tourism Development and DM 9 Tourism Development.</p> <p>The Plan clearly states that the aim of the Plan is to facilitate the growth of sustainable tourism by supporting the development of a range of high quality attractions, facilities and accommodation across our Borough at accessible locations and in a manner that will not damage our key tourism assets. The Council do not consider the principle for such development as undesirable or unsustainable and the policy wording is clear and unambiguous.</p>
LA03/DPS/0094	David Dalzell (Various Clients)	DM 5	Mr. Dalzell considers that Farm Diversification should not be limited to the re-use of existing buildings only, as sometimes new buildings will be required.	A suggested addition to Policy DM 5.4 could read 'new buildings may be required depending on the type and function of the proposed diversification activity, for example, to ensure a modern, contamination-free environment. Existing trees and hedging around a farm should be retained wherever possible and augmented with new high quality landscape planting of native species appropriate to the location. The Council will support the replacement of modern agricultural buildings with new buildings where these new buildings respect the surrounding landscape, rural character and site context.'	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>New buildings for farm diversification proposals is covered under Policy DM 5.2.</p>
LA03/DPS/0094	David Dalzell (Various Clients)	DM 5	Mr. Dalzell considers that in relation to policy DM 5, the range of activities listed could also include the sort of businesses requiring a rural, contamination-free location, as listed in Policy DM 3 para.5.33, p.93.	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that assessment of proposals for farm diversification schemes is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.</p>
LA03/DPS/0094	David Dalzell (Various Clients)	DM 9	Mr. Dalzell considers that the Council should support proposals that provide new and enhanced tourist amenities, and the extension of existing tourist amenities.	The extension of existing tourist amenities to be added.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>Enhanced tourism proposals includes extensions and will considered on their individual merits through the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.</p> <p>The DPS's evidence base for tourism is set out in Evidence Paper 5: Tourism. This document should be read for further information.</p>
LA03/DPS/0094	David Dalzell (Various Clients)	DM 9	Mr Dalzell suggests it is not clear from the wording of Policy DM 9.2 whether all four criteria (a) to (d) must all be met to satisfy this policy. Implementation could be difficult.	The wording of Policy DM 9.2 could be made clearer, i.e. to state, '...and the proposal meets, as a minimum requirement, one of the following four criteria:'	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided by the text "Why we have this Policy".</p> <p>The Council considers it is clear that the policy includes the word "or" which indicates that at least one policy has to be met.</p>
LA03/DPS/0094	David Dalzell (Various Clients)	DM 9	Mr. Dalzell considers that new hotels and guesthouses could be located in many locations in the rural area and should not be tied to a specific locational need. These could be farm diversification initiatives.	The wording should be amended to, 'The Council will support new hotels and guesthouses in the countryside where new or refurbished buildings and associated parking and access, can be integrated into the surrounding landscape, with design of high quality.'	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided by the text "Why we have this Policy".</p> <p>Where the applicant can demonstrate a need for the facility, permission may be granted alongside consideration of all LPD policies. The onus will be on the applicant to demonstrate need (which could include re-use of buildings).</p>

LA03/DPS/0094	David Dalzell (Various Clients)	DM 9	Mr. Dalzell considers that Policy DM 9.6 is self-contradictory, as it will not be possible to create a 'new' caravan site, for example, if it must form an extension to existing tourist accommodation sites. It is not clear if a proposal must comply with only one of the criteria, or all three.	This section should borrow from PPS 16 TSM 6, which has generally worked well. It should read, <i>'Proposals for new, enhanced or extended holiday or caravan parks, cabins, self-catering chalets, camping sites and similar, will be supported where they will create a high quality and sustainable form of tourism development. The location, siting, size, design, layout and landscaping of the holiday park (or similar) proposal must be based on an overall design concept that respects the surrounding landscape, rural character and site context. They could also form extensions to existing tourist accommodation sites, or be physically associated with an existing hotel or support an existing tourist attraction or recreational facility, as examples but this list is not exhaustive. Sites within established woodland, with a strong landscape setting, are particularly suitable for this type of development.'</i>	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken into account the provisions of the RDS and SPPS. The rationale for the policy is provided by the text "Why we have this Policy". The Council considers it is clear that the policy includes the word "or" which indicates that at least one policy has to be met.
LA03/DPS/0094	David Dalzell (Various Clients)	DM 9	Mr. Dalzell considers that Policy DM 9.8 is unnecessary as all holiday parks must be licensed by the Council, under parallel but separate legislation.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided by the text "Why we have this Policy".
LA03/DPS/0094	David Dalzell (Various Clients)	DM 18 B	Mr. Dalzell considers that there is no explanation for the reasoning not to allow the replacement of agricultural buildings, when workshops or stables can be replaced. If there are environmental gains such a removal of dereliction, such replacements should be allowed. Temporary dwellings (park homes, caravans) should also be eligible for replacement.	Section (DM 18.10) should be deleted. Alternatively, to accord with the wording of Policy DM 18F, DM 18.25 it could be amended to, 'However in all cases modern sheds and stores designed for agricultural purposes will not be eligible for replacement with dwellings under this policy. Temporary buildings, park homes and static caravans (where these have been used as dwellings for a minimum period of 5 years) will be eligible for replacement under this policy'.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that the policy will support the sustainable development of the countryside, whilst the suggested amendments would lead to an unsustainable relaxation of the policy for Replacement Dwellings. The representation makes reference to the replacement of workshops and stables, the Council would point out that this relates to the replacement of such buildings where they are considered Vernacular and Locally Significant Buildings, the value of which it is considered appropriate to preserve.
LA03/DPS/0094	David Dalzell (Various Clients)	SP 6	Mr. Dalzell requests that Landscape Architects are included within the list of those whom the Council will work with, similar to architects, urban designers, engineers and developers. Landscape Architects have a key role to play in placemaking, particular in the design of green and blue infrastructure, tree planting, woodland creations, public realm and access to the countryside.	No specified modification however seeks to include Landscape Architects within the list of those whom the Council will work with.	Open to minor change. The Council is suggesting the following minor change in response to the representation to acknowledge those professions that have an important role to play in placemaking and good design. It does not introduce a new policy concept. The Council is content to acknowledge the role that Landscape Architects can have in placemaking. Suggested minor change at SP 6.1, page 184 "...architects, landscape architects, urban designers..."
LA03/DPS/0094	David Dalzell (Various Clients)	DM 31	Mr. Dalzell considers that historic places will change over time and understands that there may be an 'original design concept' which may have been subsequently redesigned and reconfigured over time. Account of this should be taken when considering the impact of development proposals. Policies surrounding (Historic Parks, Gardens & Demesnes (HGPD) should not be overly restrictive. These have strong landscape structure providing screening & capacity to absorb sympathetic & high quality development, without the loss to the overall character or impact on setting of the listed buildings within them.	Amendment to wording Policy DM 31.2(b) - 'The site's original design concept, how it has changed over time, overall quality & setting.' Addition to the policy - 'The Council will support high quality, sympathetic development within HPGD that will not harm the overall setting.'	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The policy indicates that evidence should be submitted to accompany proposals that will allow for an assessment against a range of matters that include the most important features contributing to the importance of an Historic Park, Garden or Demesne. This does not preclude information being submitted regarding the impact of change over time to its original design concept that can be considered through the normal Development Management process. The Council does not consider the suggested amendment seeking support for sympathetic development within an Historic Park, Garden or Demesne to be necessary and notes that it focuses on harm not arising to the overall setting when consideration is needed of all impacts on such planned landscapes – not just its setting. As such the text proposed is considered to be too permissive when the overall aim of the policy is to provide appropriate protection of these important features of the Borough's Historic Environment.
LA03/DPS/0094	David Dalzell (Various Clients)	DM 35	Mr. Dalzell welcomes Policy DM 35, as appropriate economic and tourism development can provide a financial life-line for such HPGD estates.	No specified modification.	Support noted and welcomed.
LA03/DPS/0094	David Dalzell (Various Clients)	SP 8	Mr. Dalzell considers that in relation to SLPAs there is risk that planning policy could be overly restrictive in these areas, which are already well-protected by extant SAC/ASSI/RAMSAR designations. The Council should promote access to Lough Neagh for tourist activity. There is capacity along the shore for new access points, improvements to existing marinas and harbours and enhances public access.	Suggested policy re-wording: 'Council will support new facilities, or extensions to existing facilities around Lough Neagh where it is demonstrated that the proposal will create a high quality and sustainable form of tourism development.'	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why have we taken this approach". The Council's approach to tourism development is set out in Policies SP 2.15, DM 9.2 and DM 9.10. Policy DM 40.6 also sets out policy on tourism proposals in Lough Neagh and Lough Beg SLPA. All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.

LA03/DPS/0094	David Dalzell (Various Clients)	DM 40	Mr. Dalzell considers there is a risk that 'Strict Control' could prevent sympathetic new developments that will enhance visitor experience, improve access to the Lough and take pressure off the very few existing points of access to the water". Considers the term 'low intensity recreational or tourism use' is vague and unhelpful. Each proposal should be assessed on merit, on a case by case basis.	Suggested policy re-wording - " <i>High quality and sustainable tourism proposals. The type, location, siting and design of the proposal must respect the surrounding landscape policy area, designated areas and habits.</i> "	No change required. The Council considers that the current policy wording is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text, "Why we have taken this approach". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Proposals will be considered on their individual merits through the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0094	David Dalzell (Various Clients)	DM 44	Mr Dalzell considers that Policy DM 44 will stymie potential farm diversification projects and tourism, suggesting that the extent and greater long-term value of the lignite reserve as a fossil record is not fully known and has not been considered.	Policy DM 44 wording should be changed to read, "The Council will operate in presumption in favour of the physical preservation in-situ of the lignite reserve. It is recognised that the environmental impacts of lignite extraction are not fully known and in the meantime proposals for appropriate development in this area, which stimulate economic growth will be supported by the Council. The Council will support (in addition to (a) and (b) already stated) (c): proposals for employment use, farm diversification or tourism facilities and accommodation within this area that meet other relevant policies of the LDP".	No change required. The Council considers that the current policy wording is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".
LA03/DPS/0095	Mr Michael Erwin (TSA Planning)	Strategic Objectives	Mr .Erwin supports and welcomes Strategic Objectives 1-3.	No specified modification.	Support noted and welcomed.
LA03/DPS/0095	Mr Michael Erwin (TSA Planning)	SP 2	Mr. Erwin welcomes and supports the Council's 'Two Tier' approach to the identification of employment land, with emphasis first placed towards SELs.	No specified modification.	Support noted and welcomed.
LA03/DPS/0095	Mr Michael Erwin (TSA Planning)	SP 2	Mr. Erwin welcomes and supports the highlighting of Nutts Corner and its overall designation as a proposed SEL.	No specified modification.	Support noted and welcomed.
LA03/DPS/0095	Mr Michael Erwin (TSA Planning)	DM 1	Mr. Erwin agrees that the indicated range of uses proposed in DM 1.1 for SELs (with the exception of Nutts Corner) are consistent with the SPPS and that the policy approach is sound.	No specified modification.	Support noted and welcomed.
LA03/DPS/0095	Mr Michael Erwin (TSA Planning)	DM 1	Mr. Erwin does not agree with the additional wording within policy DM 1 relating to Nutts Corner, which he considers will limit its employment potential. The role of Nutts Corner should not be restricted to such a narrow scope and should be open to the same opportunity as all SELs.	Request to allow for a wider scope of industrial/employment uses beyond those listed, affording Nutts Corner similar functions and operational scope as that of the other identified SELs.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Policy DM 1.1 should be read alongside Policy SP 2 which refers to the ELER, as set out within Evidence Paper 3: Economic Growth, which supports the identification of a range of existing SELs including the strategically located Nutts Corner site. Nutts Corner is already home to a number of large-scale businesses that are focused on storage and distribution as well as industry. These benefit from accessible and central locations with easy access to the RSTN and gateways. As such, Nutts Corner has been identified as a Strategic Employment Location with uses limited to industrial development, transport and logistics and storage and distribution proposals. B1 business uses are directed towards our settlements and gateways in order to promote sustainable development and deliver our Spatial Growth Strategy which has been informed and is consistent with the RDS.
LA03/DPS/0095	Mr Michael Erwin (TSA Planning)	DM 1	Mr. Erwin supports the recognition and allowance within Policy DM 1.2 that complementary sui generis employment uses that would not dilute the SEL characteristics, would be acceptable.	No specified modification.	Support noted and welcomed.
LA03/DPS/0095	Mr Michael Erwin (TSA Planning)	Site Specific	Mr. Erwin suggests that the boundaries for the proposed SEL at Nutts Corner should be generously defined taking account of the previous DOE study in 1995. Mr Erwin requests subject lands be considered for inclusion in SEL designation: Nutts Corner.	Inclusion/zoning of land for development.	It is considered that due to the site-specific nature of this issue, it is a matter to be dealt with at the forthcoming Local Policies Plan stage of the LDP process, which will consider site specific designations and zonings.

LA03/DPS/0096	Lisburn & Castlereagh City Council (LCCC)	SP 2	<p>LCCC suggest that given the ample supply of employment land that already exists, the need for two additional SELs at Antrim and Ballyclare of the scale envisaged in the DPS is questioned.</p> <p>LCCC refer to paragraph 5.15 and 5.13 of the ELER and consider that in the absence of an appropriate evidence base, this proposal has the potential to adversely impact on the economic growth strategy of a neighbouring council.</p>	No specified modification.	<p>No change required. The Council considers that the designations as drafted are appropriate and reasonable and have taken account the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The evidence base for Economic Growth was published in Evidence Paper 3: Economic Growth. A Settlement Evaluation was published in Evidence Paper 2: Settlement Evaluation. These papers should be read in totality alongside the published DPS.</p> <p>Policy SP 2 "Why we have this approach" section sets out the explanation for the approach to employment lands and refers to the ELER which provides support in principle for two additional SELs – one for Antrim and one for Ballyclare. Evidence Paper 3 provides the evidence base for the two new SELs.</p> <p>The Council considers its evidence base as robust, has had regard to LCCC's proposals and is of the opinion that its economic strategy is not in conflict with a neighbouring council. Furthermore, LCCC has provided no evidence as to how new SELs at Antrim and Ballyclare could adversely impact on the economic growth strategy of LCCC.</p>
LA03/DPS/0096	Lisburn & Castlereagh City Council	SP 2	<p>LCCC consider that provided the designation of Nutts Corner as a SEL is only for consolidation and rounding-off to take account of the existing uses (as suggested in Evidence Paper 3), it has no objection to this proposal individually.</p> <p>LCCC does object, in the absence of an appropriate evidence base, to the cumulative impact that Nutts Corner could have on their economic growth strategy, when taken in combination with the proposed extension at BIA and the two proposed SELs at Antrim and Ballyclare.</p>	No specified modification	<p>The Council welcomes the support from LCCC regarding the designation of Nutts Corner as an SEL. It notes the comments regarding consolidation and rounding off. The boundary for the SEL will be identified at the LPP stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p> <p>Policy SP 2 "Why we have this approach" sets out the explanation for the approach to employment lands and refers to the ELER which provides support in principle for Nutts Corner. The evidence base for the identification of Nutts Corner as an SEL is set out in Evidence Paper 3: Economic Growth.</p> <p>The Council considers its evidence base as robust, has had regard to LCCC's proposals and is of the opinion that its economic strategy is not in conflict with a neighbouring council . LCCC has provided no evidence as to how the Council's proposals for Nutts Corner, BIA and two proposed SELs at Antrim and Ballyclare will impact on its economic growth strategy.</p>
LA03/DPS/0096	Lisburn & Castlereagh City Council	SP 2	<p>LCCC has concerns regarding the extent of the new area of land to be zoned around BIA and the scale of any non-airport related development as suggested at Evidence Paper 3, p.101.</p> <p>Whilst LCCC recognise the ambition to build capacity by growing passenger numbers, they object to the extent of the SEL, as in the absence of an appropriate evidence base, the scale or nature of the proposed complimentary uses could have the potential to adversely impact on the economic strategy of LCCC.</p>	No specified modification.	<p>The Council welcome LCCC's recognition that BIA presents in being the main airport within NI and acknowledges its role as a gateway and support in principle the ambition to build capacity by growing passenger numbers.</p> <p>The boundary of the SEL will be identified at the LLP stage, which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p> <p>Policy SP 2 "Why we have this approach" sets out the explanation for the approach to employment lands and refers to the ELER which provides support in principle for BIA. The evidence base for the identification of BIA as an SEL is set out in Evidence Paper 3: Economic Growth.</p> <p>The Council considers its evidence base as robust, has had regard to LCCC's proposals and is of the opinion that its economic strategy is not in conflict with a neighbouring council . LCCC has provided no evidence as to how an SEL at BIA could adversely impact on the economic growth strategy of LCCC.</p>
LA03/DPS/0096	Lisburn & Castlereagh City Council	SP 3	LCCC welcome the approach given to improved accessibility and connectivity to BIA and is supportive of joined-up approach with the Council to promote enhanced connectivity to BIA (including potential re-opening of Lisburn to Antrim railway line).	No specified modification.	Support noted and welcomed.
LA03/DPS/0096	Lisburn & Castlereagh City Council	Evidence Paper 3: Economic Growth	LCCC do not agree with the conclusion that the employment lands at West Lisburn and BIA and Nutts Corner SELs have different functions. LCCC considers there is no evidence to support the conclusion that West Lisburn will only serve a smaller scale local employment need.	No specified modification.	<p>The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality, this includes Evidence Paper 3: Economic Growth as well as the "Introduction" and "Why we have taken this approach" for Strategic Policy 2.</p> <p>The Council also note that LCCC has proposed in its DPS that Blaris in West Lisburn, which was identified in the RDS 2035 to be protected as a major employment site, be developed as a mixed use site incorporating housing.</p>
LA03/DPS/0096	Lisburn & Castlereagh Council	Miscellaneous	LCCC welcome cross boundary engagement and would encourage future engagement. LCCC encourage further mutual co-operation and engagement on the range of cross boundary issues presented within our "Consultation and Engagement Strategy" which was issued in June 2019.	No specified modification.	The Council welcome continued support through agreed mechanisms, such as the Metropolitan Spatial Working Group.
LA03/DPS/0097	Private Client (WYG)	Plan Vision	A WYG client indicates broad support for the DPS Plan Vision.	No specified modification.	Support noted and welcomed.
LA03/DPS/0097	Private Client (WYG)	Strategic Objectives	<p>A WYG client indicates broad support for Strategic Objectives 1-14 and in particular welcomes and supports Strategic Objectives 1, 8 and 9.</p> <p>Considers that inclusion of client's land for development will assist in meeting these objectives.</p>	No specified modification.	Support noted and welcomed.

LA03/DPS/0097	Private Client (WYG)	SP 1	A WYG client is very supportive of the proposed settlement hierarchy which seeks to retain Parkgate as a village and in particular Spatial Growth Strategy, Policy SP 1.6(d) relating to the role of villages.	No specified modification.	Support noted and welcomed.
LA03/DPS/0097	Private Client (WYG)	SP 4	A WYG client is broadly supportive of the approach taken by the Council in respect of determining housing growth figures and allocations, in particular supportive of policy SP 4.1. Considers that the Council is aware that a level of flexibility needs to be applied to housing growth figures during the plan period by virtue of policy SP 4.2 and para. 7.7.	No specified modification.	Support and welcomed.
LA03/DPS/0097	Private Client (WYG)	SP 4	A WYG client indicates that whilst housing growth figures and allocation are broadly supported, it is considered that the housing allocation as proposed for villages is unsound and needs to be revisited and reviewed. The client questions why Parkgate has such a low housing allocation when compared to other villages, which are comparable to it in terms of facilities, location, connectivity to transport corridors etc. Considers that Parkgate is equally well placed, if not more so, than other villages and exhibits a range of services and facilities.	A greater and more equitable distribution of the identified housing growth allocation for the villages within the Borough should be provided for Parkgate.	No change required. It is considered that the 10 unit housing allocation proposed for Parkgate is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Parkgate. It is considered that an increase in the overall housing allocation to Parkgate would be at odds with the considerations identified above. The DPS's evidence base for the housing allocation to Parkgate is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0097	Private Client (WYG)	DM 17	A WYG client supports the policy provisions of Policy DM 17.1 criterion (b), (c), (f) and (g) and also the requirements of policy DM 17.2.	No specified modification.	Support noted and welcomed.
LA03/DPS/0097	Private Client (WYG)	DM 17	A WYG considers that Policies DM 17.3 and DM 17.4 fail the tests of soundness, in that they do not have a sufficient degree of flexibility in line with the RDS and SPPS. Considers that the SPPS clearly states and quotes accordingly, that affordable housing is a matter that should be addressed through the 'zoning of land or by indicating, through key site requirements, where a portion of the sites may be required for social/affordable housing.'	Delete Policies DM 17.3 and DM 17.4. from the DPS. Alternatively if the above policies are to be kept, this should only be as an interim measure until such times as the LPP brings forward sites with Key Site Requirements. If this were the case, such policies should only be apply where a need for social housing has been identified by the relevant strategic housing authority.	No change required. The Council considers that the policy as draft is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rational for the policy is provided in the text "Why we have this Policy". The Council is content that the inclusion of a development management policy, as well as the potential to consider KSRs and zonings at Local Policies Plan stage is a reasonable and balanced approach to aid the delivery of affordable housing units. In order to provide certainty for all parties, the policy should be applied consistently, with the expectation that all proposals of 40 units or greater will be required to deliver affordable units. It is recognised from the NIHE Housing Needs Assessment that there is an affordable housing need across the entire Borough. If Policy DM 17.3 was only to be applied to those settlements or geographical locations where a need has been identified, this could significantly undermine the potential of the policy to meet the overall needs of the Borough. The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.
LA03/DPS/0097	Private Client (WYG)	SP 5	A WYG client indicates support for the text within paras. 8.1, 8.3 and 8.10 and also the provisions of policies SP 5.1, SP 5.2, SP 5.4 and SP 5.5.	No specified modification.	Support noted and welcomed.
LA03/DPS/0097	Private Client (WYG)	DM 24	A WYG client supports the provisions of Policies DM 24.1, DM 24.2 and DM 24.3 and amplification text 8.25. Considers that these policy provisions provide a level of flexibility in terms of the location of new community facilities both within settlements and within the countryside.	No specified modification.	Support noted and welcomed.
LA03/DPS/0097	Private Client (WYG)	DM 25	A WYG client indicates broad support for policy DM 25.1, in requiring a design-led approach.	No specified modification.	Support noted and welcomed.

LA03/DPS/0097	Private Client (WYG)	Site Specific	A WYG client request subject lands be considered for housing development: Parkgate.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0097	Private Client (WYG)	Site Specific	A WYG client considers that a small number of potential housing sites are available within Parkgate and highlights issues around their deliverability in a timely manner. The client considers that in effort to allow for flexibility, some additional housing land should be incorporated within the settlement limit.	Additional lands are required to accommodate future growth for the plan period to allow for flexibility.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0097	Private Client (WYG)	Site Specific	A WYG client request subject lands be considered for community facilities: Parkgate.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0098	Department of Education (WYG)	Setting the Context	DE is fully supportive of Section 2 'Setting the Context,' as Council has identified education as part of this and specifically references the proposed project for Gaelscoil Eanna. Representation is also fully supportive of 'Outcome 4' and 'Priority (c)' relating to the Community Plan.	No specified modification.	Support noted and welcomed.
LA03/DPS/0098	Department of Education (WYG)	Plan Vision	DE indicate broad support for the DPS Plan Vision.	No specified modification.	Support noted and welcomed.
LA03/DPS/0098	Department of Education (WYG)	Strategic Objectives	DE indicate broad support for Strategic Objectives 1-14 and in particular welcomes and supports Strategic Objectives 1, 7, 8 and 9. Considers that inclusion of client's land for development will assist in meet these objectives.	No specified modification	Support noted and welcomed.
LA03/DPS/0098	Department of Education (WYG)	SP 1	DE fully support of Strategic Policy 1 : Sustainable Development.	No specified modification.	Support noted and welcomed.
LA03/DPS/0098	Department of Education (WYG)	DM 7	DE is supportive of the policy provisions of Policy DM 7.4, relating to the proposed flexibility in providing for education facilities in out-of-centre locations, where they are easily accessible to the communities that they are intended to serve.	No specified modification.	Support noted and welcomed.
LA03/DPS/0098	Department of Education (WYG)	SP 5	DE are supportive of policy approach of Policy SP 5 and welcomes confirmation from the Council that there will be identification and safeguarding of sites for future educational facilities (para.8.10). Acknowledges that identifying such sites will be a matter for the Local Policies Plan. Considers that the inclusion of client's land for a new school facility is consistent with the policy direction.	No specified modification.	Support noted and welcomed.

LA03/DPS/0098	Department of Education (WYG Planning & Environment)	DM 24	DE support the policy provisions of Policies DM 24.1, DM 24.2 and DM 24.3 and associated amplification text (para. 8.25).	No specified modification.	Support noted and welcomed.
LA03/DPS/0098	Department of Education (WYG)	DM 37	DE support Policy DM 37.5 as it is reflective of current operational policy under Policy NH4 of Planning Policy Statement 2 – Natural Heritage, and the provisions of the SPPS. Notes that other areas of local nature conservation importance will be considered as part of the LDP process, to be designated as SLNCI's in the LPP and reserves the right to comment further.	No specified modification.	Support noted and welcomed. Due to the site specific nature of this issue, this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0098	Department of Education (WYG)	DM 39	DE supports Policy DM 39 as it mirrors current operational policy under Policy NH5 of PPS 2 and the provisions of the SPPS. Considers that the wording of Policy DM 39.1 is slightly less restrictive than the provisions of Policy NH5 of the PPS 2 and SPPS. Welcomes this policy and the flexibility within.	No specified modification.	Support noted and welcomed.
LA03/DPS/0098	Department of Education (WYG)	Site Specific	DE requests that subject lands are considered for new school premises: Metropolitan Newtownabbey.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0099	Mr Paul Frazer (WYG)	Plan Vision	Mr. Frazer indicates broad support for the DPS Plan Vision.	No specified modification.	Support noted and welcomed.
LA03/DPS/0099	Mr Paul Frazer (WYG)	Strategic Objectives	Mr. Frazer indicates broad support for Strategic Objectives 1-14 and in particular welcomes and supports Strategic Objectives 1 and 8. Considers that Mr Frazer's lands are appropriately located to assist in the facilitation of the Strategic Objectives.	No specified modification.	Support noted and welcomed.
LA03/DPS/0099	Mr Paul Frazer (WYG)	SP 1	Mr. Frazer considers that given the current position of Newtownabbey as part of the Metropolitan Urban Area with BMAP 2015, is very supportive of it being retained as Metropolitan Newtownabbey. Therefore Mr Frazer agrees with and supports the proposed settlement hierarchy and in particular the Spatial Growth Strategy, point SP 1.6 (a).	No specified modification.	Support noted and welcomed.
LA03/DPS/0099	Mr Paul Frazer (WYG)	SP 4	Mr. Frazer is broadly supportive of the approach taken by the Council in respect of determining housing growth figures and allocations, in particular supportive of policy SP 4.1. Considers that the Council is aware that a level of flexibility needs to be applied to housing growth figures during the plan period by virtue of policy SP 4.3 and para. 7.7.	No specified modification.	Support noted and welcomed.

LA03/DPS/0099	Mr Paul Frazer (WYG)	SP 4	Mr. Frazer acknowledges the approach of the Council in the provisions of Policies SP 4.7 and SP 4.8 and paras. 7.20 to 7.22. Mr Frazer welcomes the Council's approach in considering the need to zone land at LPP stage for affordable and social housing. States that development of residential units on Mr Frazer's lands will deliver additional and much needed housing, helping to meet the identified social housing need for the Antrim and Newtownabbey Borough Council area.	No specified modification.	Support noted and welcomed.
LA03/DPS/0099	Mr Paul Frazer (WYG)	DM 17	Mr. Frazer supports the policy provisions of Policy DM 17.1 criteria (a), (c), (f) and (g) and the requirements of policy DM 17.2.	No specified modification.	Support noted and welcomed.
LA03/DPS/0099	Mr Paul Frazer (WYG)	DM 23	Mr. Fraser broadly supports the provisions of Policy DM 23, in particular the first exception test under Policy DM 23.2 (a), which allows for development that would bring significant community benefits that clearly outweigh loss of open space. Also welcomes the inclusion of amplification text (para. 8.18), relating to the specific reference to social housing as an example of significant community benefit.	No specified modification.	Support noted and welcomed.
LA03/DPS/0099	Mr Paul Frazer (WYG)	DM 25	Mr. Frazer is in broad support for Policy DM 25.1, in requiring a design-led approach.	No specified modification.	Support noted and welcomed.
LA03/DPS/0099	Mr Paul Frazer (WYG)	SP 8	Mr. Frazer notes that his land lies within Local Landscape Policy Area (LLPA) MNY 45 (BMAP) and that the Council will identify the boundaries in respect of LLPAs in the LPP.	No specified modification.	Due to the site specific nature of this issue, this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0099	Mr Paul Frazer (WYG)	DM 40	Mr. Frazer notes the policy provisions of Policy DM 40.7 and considers that his land will not result in acceptable adverse impacts on such features.	No specified modification.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0099	Mr Paul Frazer (WYG)	Site Specific	Mr. Frazer requests subject lands be considered for housing development: Metropolitan Newtownabbey.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0100	Nigel Herdman (WYG)	Setting the Context	Mr. Herdman is fully supportive of section 2 'Setting the Context' as the Council has identified economic prosperity as one of the proposed key outcomes of the plan.	No specified modification.	Support noted and welcomed.
LA03/DPS/0100	Nigel Herdman (WYG)	Plan Vision	Mr. Herdman indicates broad support for the Plan's Vision.	No specified modification.	Support noted and welcomed.
LA03/DPS/0100	Nigel Herdman (WYG)	Strategic Objectives	Mr. Herdman indicates broad support for Strategic Objectives 1 - 14 (1,3, and 6 in particular).	No specified modification.	Support noted and welcomed.

LA03/DPS/0100	Nigel Herdman (WYG)	SP 1	Mr. Herdman is supportive of Policy SP 1.1 and the commitment that the Council will work with applicants to find solutions so that proposals can be approved wherever possible, to secure development that improves the economic, social and environmental conditions of the Borough.	No specified modification.	Support noted and welcomed.
LA03/DPS/0100	Nigel Herdman (WYG)	SP 1	Mr. Herdman has expressed support for the Plan's Spatial Growth Strategy and in particular, so far as it seeks to recognise the importance of Nutts Corner as a Strategic Employment Location.	No specified modification.	Support noted and welcomed.
LA03/DPS/0100	Nigel Herdman (WYG)	SP 2	Mr. Herdman has expressed his support for the Council's policy approach to the proposed Strategic Employment Location at Nutts Corner.	No specified modification.	Support noted and welcomed.
LA03/DPS/0100	Nigel Herdman (WYG)	DM 1	<p>Mr. Herdman is broadly supportive of the Council's policy approach to Policy DM 1, on the basis that it aims to direct a wide range of economic uses and provide protection for Strategic Employment Locations, and in particular Nutts Corner. Mr Herdman has also expressed support for the allowance of appropriate sui generis and ancillary uses on Strategic Employment Locations where they will not lead to a significant diminution of its role.</p> <p>However, considers the policy is too restrictive, and does not incorporate an appropriate degree of flexibility through restricting the type of uses deemed acceptable at Nutts Corner Strategic Employment Location.</p>	For the policy to specify that all uses under Part B (Industrial and Business Uses) as being acceptable.	<p>Support noted and welcomed.</p> <p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Policy DM 1.1 should be read alongside Policy SP 2 which refers to the ELER which supports the identification of a range of existing SELs including the strategically located Nutts Corner site. The evidence base for the identification of Nutts Corner as an SEL is set out in Evidence Paper 3: Economic Growth.</p> <p>Nutts Corner is already home to a number of large-scale businesses that are focused on storage and distribution as well as industry. These benefit from accessible and central locations with easy access to the RSTN and gateways. As such, Nutts Corner has been identified as a Strategic Employment Location with uses limited to industrial development, transport and logistics and storage and distribution proposals. B1 business uses are directed towards our settlements and gateways in order to promote sustainable development and deliver our Spatial Growth Strategy which has been informed and is consistent with the RDS.</p>
LA03/DPS/0100	Nigel Herdman (WYG)	DM 2	<p>Mr. Herdman is broadly supportive of Policy DM 2 as it mirrors current operational policy under PPS 4 and the provisions of the SPPS. These policy provisions are welcomed as they give an element of flexibility for economic development within the countryside.</p> <p>However, Mr Herdman considers the provisions are limited under Policy DM 2.8. The policy provides only a limited number of areas where redevelopment proposals will be considered and is more restrictive than PPS 4 Policy PED 4.</p>	Policy should be amended to provide wider guidance and options for the redevelopment of established economic development uses similar to current operational planning policy, in order to provide a greater degree of flexibility and choice.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers Policy DM 2.8 provides adequate flexibility for proposals for the redevelopment of an established industrial or business enterprise in the countryside and would advise that this has taken account both of existing policy in PPS 4 and the SPPS. The Council also would point to the provisions of Policy DM 18.31(b) in relation to the provision of affordable housing on an existing developed or degraded site in the countryside and considers this should be read in conjunction with Policy DM 2.8.</p>
LA03/DPS/0100	Nigel Herdman (WYG)	Site Specific	Mr. Herdman requests subject lands be considered for inclusion in SEL designation: Nutts Corner.	Inclusion of lands within Nutts Corner Strategic Employment Location.	It is considered that due to the site specific nature of this issue, it is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0101	Hyde Family (RPS)	SP 3	<p>The Hyde family considers Policy SP 3.12 is inconsistent with the RDS and the SPPS as it is not in the public interest.</p> <p>Considers the policy reinforces an unfair advantage to car parking within the confines of the Belfast International Airport boundary with no requirement to justify the scale or location of parking within that zoning (policy acts in the commercial interests of one private party over another).</p> <p>Potential airport car parking providers are required to provide robust analysis of need but Belfast International Airport hold all relevant statistical data required to undertake any such exercise in quantifying that need.</p> <p>Considers Policy SP 3.12 is specifically creating a policy to favour only one commercial party.</p>	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text, "Why we have this approach".</p> <p>Policy SP 3.12 states that the Council will support car parking on lands allocated for airport related use. The Council considers that the provision of adequate parking to serve BIA is in the public interest and that it is both reasonable and appropriate to accommodate this on lands in close proximity to the airport itself. Beyond the lands currently allocated, proposals for airport related car parking will also be supported where robust analysis has been provided that confirms there is a demonstrable need and that the proposal accords with other relevant policies of the LDP.</p> <p>As such the Council considers reasonable opportunity is being provided for commercial operators through both the zoning of land for airport operations and the application of the relevant DPS policy .</p>

LA03/DPS/0101	Hyde Family (RPS)	SP 3	<p>The Hyde family considers there is a lack of coherence within the DPS. Whilst they support the overall economic strategy in supporting economic growth, Policy SP 3.12 (in conjunction with 3.15) results in unnecessary conflict and tension in relation to the overall strategy and other policies seeking to promote sustainable economic development. Imposition of policy requirement to provide robust evidence of need compromises the overall strategy and introduces unacceptable tensions between policies which can result in going to the courts for clarification.</p> <p>Presumption in favour of airport related uses within the defined boundary is understandable but there is no justification for a further test for potential commercial operators. Hyde Family operate successfully and the PAC has accepted their site does not compromise sustainable development by granting permission for the expansion of a lawfully established development. The site does not negatively impact on the viability of the airport as a Gateway.</p>	No specified modification.	<p>No change required. The Council considers there is no demonstrated conflict with other policies nor conflict with the overall strategy.</p> <p>Planning histories will be considered at the Local Policies Plan Stage when the boundary of BIA SEL will be determined.</p>
LA03/DPS/0101	Hyde Family (RPS)	Evidence Paper 10: Transportation	<p>The Hyde family considers there is a lack of robust evidence base in Evidence Paper 10 to justify the Council's Plan approach to airport car parking provision.</p> <p>Highlights that Evidence Paper 10 makes reference to a Car Parking Strategy being prepared by the Council and a future DfI Local Transport Plan. Notes that neither of these documents have yet been published and in that extent there is no evidential justification for the approach adopted in the DPS.</p> <p>Considers the public are being deprived an opportunity to comment on proposed strategies /policies that are directly relevant to the DPS.</p>	No specified modification.	<p>The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 2. The Council considers that the comments raised have no impact on the soundness of the draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. .</p> <p>In 2017 the Council published its Preferred Options Paper and stated in relation to policy development that broad thrust and direction of the majority of Departmental Planning Policies were acceptable and working effectively. This includes PPS 3 where the need test for car parking is already established. The Council's intention was to bring forward the policies in the LDP. Page 21 of the DPS sets out the background to how the Council got to the current stage of the LDP including the publication and outcome of its POP.</p> <p>DfI is bringing forward a suite of Transport Plans and has recently published the Belfast Metropolitan Transport Study which covers the BMA area including ANBC's larger settlements. The Council's Car Parking Strategy relates to Council owned car parks only which is in settlements. The Council has provided a statement on its forthcoming carparking strategy for the purposes of clarification - see Council Car Parking Strategy Statement.</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Setting the Context	<p>Although reference is made to the draft Marine Plan, NIEA (NED) advise to give regard and prominence to the UK Marine Policy Statement (MPS), given the legislative obligations under marine legislation and its equivalent standing to terrestrial planning policy documents, such as RDS and SPPS.</p> <p>The Council is further advised to give marine policy documents the same consideration within the DPS. As the boundary with Belfast Lough and its role in the Council's setting is recognised, the local planning context should make reference to the adjoining marine areas and other linkages to it.</p> <p>It is not evident how the legal requirements of Section 8 under the Marine Act (NI) 2013 (MANI) and Section 58 under Marine and Coastal Access Act (2009) (MCAA) have been applied. Council is reminded that the UK MPS is a material consideration in making decisions on planning applications (draft Marine Plan having limited weight).</p>	<p>Greater prominence should be afforded to marine policy documents, in particular the UK MPS.</p> <p>The Local Policy Context should make reference to the Council's marine area i.e. Belfast Lough, as well as linkages to it (such as watercourses etc).</p>	<p>Open to minor change.</p> <p>The Council is suggesting inclusion of the following additional paragraphs in response to the representation for the purposes of clarification to make the Council's legal responsibility under Section 8 of the Marine Act (NI) 2013 explicitly clear.</p> <p>The Council has been and continues to be aware of its responsibilities under the Marine Act and the suggested minor change does not introduce any new policy concept, rather it is factually based. It is clear when the DPS and its evidence base are read together that the DPS took account of the marine area (e.g. paragraph 2.5 of the DPS, the SA Scoping Report and Appraisal as well as the Draft Habitats Regulation Assessment). In addition, the policy concept already exists in existing policy (which is a material planning consideration) including regional marine policy (UK Marine Policy Statement/draft Marine Plan for Northern Ireland) and the SPPS (paragraph 6.50 in particular.)</p> <p>Suggested minor change at page 30/31, after para. 2.20. " UK Marine Policy Statement 2.21 The UK Marine Policy Statement (MPS) was published in September 2011 and was prepared and adopted under the Marine and Coastal Access Act 2009. The statement provides the policy framework for the Marine Planning system and for taking decisions that have the potential to impact on the marine environment. The policy framework will contribute to the achievement of sustainable development in the UK's marine area which includes both offshore and inshore regions including all tidal rivers and sea loughs. As our Borough abuts Belfast Lough, the Plan Strategy has had regard to the provisions of the MPS."</p> <p>"Draft Marine Plan for Northern Ireland 2.22 The draft Marine Plan for Northern Ireland was published in April 2018 by the Department of Agriculture, Environment and Rural Affairs (DAERA). The draft Marine Plan has been developed within the framework of the UK Marine Policy Statement (MPS) in order to protect and sustainably manage the marine environment in Northern Ireland and facilitate sustainable development including coastal areas. The draft Marine Plan will inform and guide the regulation, management, use and protection of our marine area, both the offshore and inshore regions. The draft Marine Plan was taken into account in preparing the draft Plan Strategy and will continue to inform the LDP process, until such time as it is adopted."</p> <p>"2.23 Under Section 8 of the Marine Act (NI) 2013 the Council must take any authorisation or enforcement decision in accordance with any appropriate marine plan unless relevant considerations indicate otherwise." As a consequence of this suggested change the remaining paragraphs will be renumbered whilst the existing reference to "emerging Marine Plan" will be deleted in Paragraph 2.5 on page 26.</p>

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Strategic Objectives	<p>NIEA (NED) considers that whilst there is reference to the coast and loughs in Strategic Objective 11, this is solely in relation to biodiversity and natural habitats.</p> <p>It would be beneficial to include a strategic objective on the integration of sustainable growth and management of development within the marine area.</p>	Incorporate additional strategic objective for the marine area.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to clarify and acknowledge the importance of that part of the Borough with a coastline onto Belfast Lough and acknowledge explicitly that the Strategic Objective for Sustainable Development applies. Strategic Objective 1 as drafted already applies to the Council's settlements and countryside which incorporates the Borough's coastal area. As such the reference to coast now suggested is not introducing anything new, rather it offers explicit recognition to the Borough's coast and it will also complement the text of Strategic Objective 11.</p> <p>This minor change is also intended to complement those suggested minor changes which seek to clarify and make clear the Council's legal responsibility under Section 8 of the Marine Act (NI) 2013.</p> <p>Suggested minor change at Strategic Objective 1, page 58, "...in our settlements, countryside and coast..."</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SP 1	<p>NIEA (NED) has advised the Council to reflect the requirements under marine legislation with regards to decision making on authorisation and enforcement decisions.</p>	No specified modification.	<p>Open to minor change.</p> <p>The Council is suggesting inclusion of the following additional paragraph in response to the representation for the purposes of clarification to make the Council's legal responsibility under Section 8 of the Marine Act (NI) 2013 explicitly clear.</p> <p>The Council has been and continues to be aware of its responsibilities under the Marine Act and the suggested minor change does not introduce any new policy concept, rather it is factually based. It is clear when the DPS and its evidence base are read together that the DPS took account of the marine area (e.g. paragraph 2.5 of the DPS, the SA Scoping Report and Appraisal as well as the Draft Habitats Regulation Assessment). In addition, the policy concept already exists in existing policy (which is a material planning consideration) including regional marine policy (UK Marine Policy Statement/draft Marine Plan for Northern Ireland) and the SPPS (paragraph 6.50 in particular.)</p> <p>Suggested minor change at page 62, after SP 1.2, insertion of new paragraph. "SP 1.3 In addition any development proposal which affects or might affect the whole or any part of the marine area of Belfast Lough must accord with the provisions of the UK Marine Policy Statement and the Draft Marine Plan for NI once adopted unless relevant considerations indicate otherwise."</p> <p>As a consequence of this suggested change the remaining paragraphs will be renumbered.</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SP 1	<p>NIEA (NED) considers it is unclear whether the impacts on the marine area were considered as part of the Spatial Growth Strategy. Furthermore, it is essential that spatial zoning at the LPPs stage also considers any impact or potential for impact on the marine area.</p>	No specified modification.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor changes in response to the representation to clarify and acknowledge that the protection of the Borough's natural and historic environment includes the marine environment. This minor change is also intended to complement those suggested minor changes which seek to clarify and make clear the Council's legal responsibility under Section 8 of the Marine Act (NI) 2013.</p> <p>The Council has been and continues to be aware of its responsibilities under the Marine Act and the suggested minor change does not introduce any new policy concept, rather it is factually based. It is clear when the DPS and its evidence base are read together that the DPS took account of the marine area (e.g. paragraph 2.5 of the DPS, the SA Scoping Report and Appraisal as well as the Draft Habitats Regulation Assessment). In addition, the policy concept already exists in existing policy (which is a material planning consideration) including regional marine policy (UK Marine Policy Statement/draft Marine Plan for Northern Ireland) and the SPPS (paragraph 6.50 in particular.)</p> <p>Suggested minor change SP 1.6(g), page 65 "...afford suitable protection to our Borough's natural and historic environment, including the adjacent marine environment, in accommodating growth..."</p> <p>Suggested minor change para. 4.2, page 68 "...the careful management of our historic environment and natural heritage, including the adjacent marine area."</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SP 1	<p>In relation to development impact assessments, NIEA (NED) considers it would be helpful to highlight that impacts could be felt on the marine area and that impacts (including potential impacts) on the marine area will also be considered in the decision making process.</p>	Reflect this in the text.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to clarify and acknowledge that the impact of development proposals on land must also consider any relevant impacts on the marine area. This minor change is also intended to complement those suggested minor changes which seek to clarify and make clear the Council's legal responsibility under Section 8 of the Marine Act (NI) 2013.</p> <p>The Council has been and continues to be aware of its responsibilities under the Marine Act and the suggested minor change does not introduce any new policy concept, rather it is factually based. It is clear when the DPS and its evidence base are read together that the DPS took account of the marine area (e.g. paragraph 2.5 of the DPS, the SA Scoping Report and Appraisal as well as the Draft Habitats Regulation Assessment). In addition, the policy concept already exists in existing policy (which is a material planning consideration) including regional marine policy (UK Marine Policy Statement/draft Marine Plan for Northern Ireland) and the SPPS (paragraph 6.50 in particular.)</p> <p>Suggested minor change at SP 1.4, page 63 "...to allow proper consideration of the impacts of the development (to include where relevant impacts on the marine area) and any mitigation measures proposed."</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 4	<p>NIEA (NED) welcomes Policy DM 4.4 which addresses environmental effects in relation to ammonia production.</p>	No specified modification.	<p>Support noted and welcomed.</p>

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SP 6	NIEA (NED) considers that a number of policies within Place Making and Good Design and Natural Heritage, refer to landscape, its protection and integration with landscape. It is suggested that explicit reference to seascape is made within relevant policies and accompanying amplifications, especially were a coastal element is acknowledged. This will ensure seascape will be considered within the decision making process, as required under the UK MPS and marine legislation.	To specifically reference seascape in policy SP 6, other relevant policies and associated amplification text.	No change required to Policy SP 6. The Council considers that the policies and amplifications as drafted are appropriate and reasonable and have taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Please note that the Council has acknowledged within the Natural Heritage section of the Plan, that it is open to the inclusion of references to seascape, which it considers is adequate to address this matter. As previously stated, all the policies of the plan should be read together.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SP 8	NIEA (NED) supports in principle the aims of Policy SP 8 and welcomes the offer to work in partnership with the Council to protect, conserve and promote the enhancement and restoration of the diversity of the Borough's natural heritage. NED supports the Council's intention to publish Strategic Landscape Policy Areas, Local Landscape Policy Areas, Sites of Local Nature Conservation Interest and a Coastal Policy Area at the LPP stage of the LDP process.	No specified modification.	Support noted and welcomed.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SP 8	NIEA (NED) points out that a number of policies in Policy SP 8 refer to landscape, its protection and integration with landscape. It is suggested that explicit reference to seascape is made within relevant policies and accompanying amplifications, especially where a coastal element is acknowledged. This will ensure seascape will be considered within the decision making process, as required under the UK (MPS) and marine legislation.	Suggest reference to seascape in Policy SP 8.	Open to minor change. The Council is suggesting the following minor changes in response to the representation to clarify that the references to landscape character and coast in Policy SP 8.4 and DM 41.1 (b) is intended to include consideration of seascape character. This change does not introduce a new policy concept as it is clear when the DPS and its evidence base are read together that the Council is seeking to protect the coastal character of that part of the Borough adjacent to Belfast Lough (including both land and sea). There is reference in 3.3 of the SPPS that protection and enhancement of the natural environment includes landscape and seascape character and it is therefore clear that protection of the Borough's coastal environment, to includes both land and sea, is already a material consideration. Suggested minor change at SP 8.4, page 237"...the overall landscape character, seascape character and specific..." Suggested minor change at DM 41.1(b), page 253"...the qualities of the coastal landscape (including seascape character) while still protecting..." Suggested minor change at para. 11.43, page 255"...Coastal Policy Area should consider their impact on seascape character and how they can enhance the area..."
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SP 8	NIEA (NED): Figure 12 on page 240 of the Plan. The dotted shading for SLPAs should clearly be shown along the landward edge of Lough Neagh (this seems to be clearer for Lough Beg).	To clearer show the SLPA boundary along the landward edge of Lough Neagh.	The written text of Policy SP 8.6 in the Draft Plan Strategy makes clear that the proposed SLPA for Lough Neagh and Lough Beg includes the shorelines with precise boundaries to be brought forward in the LPP. Fig. 12 on page 240 of the Plan seeks to illustrate this diagrammatically together with other proposed SPLAs. The Council will however consider the diagrammatical shading used for SLPAs in bringing forward the adopted Plan Strategy with a view to making Fig. 12 clearer.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 37	NIEA (NED) supports Policy DM 37 (sections DM 37.1 to DM 37.5 inclusive).	No specified modification.	Support noted and welcomed.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 37	NIEA (NED) point out that Amplification paragraph 11.17 is possibly contradicted by the last sentence of paragraph 11.15. Paragraph 11.17 more accurately reflects the intent of PPS 2 Policy NH 1.	No specified modification.	No change required. The Council considers that policy amplification as drafted as appropriate and reasonable and does not accept that there is any contradiction between the two paragraphs referred to.

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 38	<p>NIEA (NED) supports Policy DM 38 in principle, however, the requirement for 'evidence' of protected species to determine the need for the developer to carry out protected species surveys as suggested in amplification text 11.27 is not in the spirit of PPS 2 or SPPS in that the potential for protected species should be enough to require protected species surveys to be carried out.</p> <p>The use of the word 'evidence' may suggest that the Council should provide the 'evidence' before asking for surveys when in effect the surveys are the 'evidence'.</p> <p>NED has concerns regarding the inclusion of the word 'evidence', and strongly suggest that it is changed to 'potential'. The paragraph could read to mean that the onus to provide evidence is on someone rather than the developer before a developer is asked to carry out a survey. Considers this could lead to a breach of legislation at Development Management level.</p>	Reference to 'evidence' to be changed to 'potential'.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to clarify the nature of the information required to establish the presence of protected species in association with a development proposal. Such species are protected by law.</p> <p>It is clear that when the DPS and its evidence base are read together that appropriate protection is to be afforded to protected species in assessing development proposals, whilst the possible need for an ecological appraisal to accompany a proposal is also set out in SP 1.</p> <p>There is a range of legislation that promotes the protection and conservation of our environment, including the Conservation (Natural Habitats, etc.) Regulations (NI) 1995, the Wildlife and Natural Environment Act (NI) 2011, the Wildlife (NI) Order 1985 etc as well as detailed policy provisions in regional policy such as the RDS 2035 and the SPPS.</p> <p>Suggested minor change at para. 11.27, page 246 "Developers will be required to undertake an ecological appraisal, including where necessary surveys for protected species, where there is potential, or evidence to suggest, that they are present on site or..."</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 39	NIEA (NED) supports Policy DM 39 in principle, however, state that the omission of the words 'or damage' may have the effect of weakening the regional policy. Considers PPS 2 Policy NH 5 'unacceptable adverse impact or damage' is a stronger test.	NIEA (NED) comment infers policy text should be amended to incorporate "unacceptable adverse impact or damage".	No change required. The Council considers the policy as drafted is appropriate and reasonable and that the term 'unacceptable adverse impact' includes damage.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 39	NIEA (NED) have concerns regarding the inclusion of the word 'evidence'. As such, NED strongly suggest that the word 'evidence' is changed to 'potential'.	DAERA strongly suggest that the word 'evidence' in Policy DM 39.2 is changed to 'potential'.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to clarify when survey information or an ecological appraisal will be required in association with a development proposal. The text is simply for clarification purposes.</p> <p>It is clear that when the DPS and its evidence base are read together that appropriate protection is to be afforded to habitats, species and other features of natural heritage interest in assessing development proposals, whilst the possible need for an ecological appraisal to accompany a proposal is also set out in SP 1.</p> <p>There is a range of legislation that promotes the protection and conservation of our environment, including the Conservation (Natural Habitats, etc.) Regulations (NI) 1995, the Wildlife and Natural Environment Act (NI) 2011, the Wildlife (NI) Order 1985 etc as well as detailed policy provisions in regional policy such as the RDS 2035 and the SPPS.</p> <p>Suggested minor change at Policy DM 39.2, page 247 "Where there is potential, or evidence to suggest, that a habitat...."</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 40	NIEA (NED) considers Paragraph 11.35 should be amended to include reference to landscape as a recreational asset in addition to economic and cultural.	Paragraph 11.35 to be amended to include reference to landscape as a recreational asset.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor factual addition in response to the representation in recognition of the role of the Borough's landscape resource as a recreational asset. This does not introduce a new policy concept as it is clear when the DPS and its evidence base are read together that the Council recognises the beneficial contribution of the Borough's landscape resource to recreation.</p> <p>Suggested minor change at para. 11.35, page 250 "...as well as being important economic, recreational and cultural assets."</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 40	NIEA (NED) would recommend that the first line should be amended to "The aim of this policy is to ensure that the visual amenity, landscape character and distinctiveness afforded by our Borough's natural environmental resources are comprehensively considered in assessing development proposals."	Amend first line of amplification text 11.37 to read: "The aim of this policy is to ensure that the visual amenity, landscape character and distinctiveness afforded by our Borough's natural environmental resources are comprehensively considered in assessing development proposals".	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 40	<p>NIEA (NED) considers Policy DM 40.1A should be amended to : "The degree to which development will affect the visual amenity and scenic qualities of the area".</p> <p>The reason for this suggested amendment is that any confusion should be avoided between the terms 'visual amenity' and 'landscape character', the latter being mentioned separately in point (C).</p>	Amend Policy DM 40.1A to - "The degree to which development will affect the visual amenity and scenic qualities of the area".	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy".</p> <p>The Council considers that the impact of development on visual amenity is adequately covered by the criteria set out in Policy DM 40.1(c).</p>

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 40	NIEA (NED) states that normally landscape analysis forms part of a Landscape and Visual Impact Assessment (LVIA) and the Council may consequently wish to amend the wording. NED suggest looking towards best practice set out in the publication 'Guidelines for Landscape and Visual Impact Assessment' (3rd edition: 2013).	Amend wording to reflect that a landscape analysis forms part of the LVIA.	Open to minor change. The Council is suggesting the following minor change in response to the representation in recognition that the professional terminology widely for landscape appraisal is a Landscape and Visual Impact Assessment. This suggested amendment does not introduce a new policy concept and is solely for clarification purposes. Suggested minor change at Policy DM 40.2, page 251"...assessment of landscape impacts a Landscape and Visual Impact Assessment proportionate to the development ..."
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 40	NIEA (NED) notes the Antrim Coast and Glens AONB is within 1km of the Council area. NED suggest that it is possible that a development proposal within the Council area could impact on the AONB so this should be referenced. It is also possible that the boundary of the existing AONB could be redefined to include land within the Council Area.	Reference to Antrim Coast and Glens AONB.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". In relation to the existing AONB, any impacts that might arise from development within the Borough would be considered through the normal Development Management process, having regard to the provisions of Policy SP 1.2. In relation to any proposed future extension of the AONB, the Council will consider the need to revise the LDP should this arise at that time.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 40	NIEA (NED) considers the prescriptive nature of stating which sizes of development will need a LVIA may lead to problems of confusion and requests for clarification. It may be more useful to indicate that a proportionate LVIA may be required for all forms of development within a defined landscape setting. The term 'countryside' should be avoided as it is open to interpretation and challenge. For minor applications this may be a case of an applicant stating that, 'the landscape and visual implications were considered and such an assessment was deemed unnecessary' but at least this landscape and visual baseline has been covered.	DAERA suggest it may be more useful to indicate that a proportionate LVIA may be required for all forms of development within a define landscape setting. To avoid the use of the word 'countryside'.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The Council considers the policy makes clear the circumstances where an LVIA will be required to accompany a planning application, but does not rule out the Council requesting such an assessment in other appropriate cases where deemed necessary. It is clear from the content of the Plan that countryside comprises all lands outside defined settlements.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 40	NIEA (NED) agrees with Policy DM 40.3 points A-E. The first one (a) seems to encapsulate the following ones to some or greater extent. These criteria should be reviewed again to avoid duplication.	Revisit Policy DM 40.3 A-E to avoid duplication.	Support noted and welcomed. No text change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The Council considers the policy as drafted makes clear the specific matters to be considered in assessing landscape impact.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 40	NIEA (NED) are unsure why the Cammoney Hill SPLA has been singled out for policy detail. NED agree with point C, however, would advise against commercial forestry on Cammoney Hill due to its inappropriate appearance and consequent impact on the landscape character.	No specified modification.	Support noted and welcomed. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the SLPA referred to is subject to specific development pressures that warrants the additional policy provisions set out in the DPS. Comments regarding commercial forestry noted.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 40	NIEA (NED) are unsure why the Lough Neagh/Lough Beg SLPA has been singled out for policy detail. NED agree with point C, however, would advise against commercial forestry within these areas due to its inappropriate appearance and consequent impact on the landscape character.	No specified modification.	Support noted and welcomed. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The Council considers the SLPA referred to is subject to specific development pressures that warrants the additional policy provisions set out in the draft Plan Strategy. Comments regarding commercial forestry noted.

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 41	NIEA (NED) considers Policy DM 41 appears only to apply on the inter-tidal area, whereas the scope of the marine legislation and its application is much wider than the inter-tidal area.	NED advise that the statement '...development proposals will be assessed against the provisions of the UK MPS and Marine Plan (once adopted)' should be considered for application across other policies, as many development proposals may have the potential to impact on the marine area. Important that the Council ensures decisions on development proposals that effect or have the potential to effect the marine area should be made in accordance with marine policy documents, including the UK MPS and draft Marine Plan once adopted. A statement of this effect should also be stated at the outset of the draft PS and drawn out in appropriate policies.	Open to minor change. The Council is suggesting the following minor change in response to the representation for the purposes of clarification to make the Council's legal responsibility under Section 8 of the Marine Act (NI) 2013 explicitly clear. The Council has been and continues to be aware of its responsibilities under the Marine Act and the suggested minor change does not introduce any new policy concept, rather it is factually based. It is clear when the DPS and its evidence base are read together that the DPS took account of the marine area (e.g. paragraph 2.5 of the DPS, the SA Scoping Report and Appraisal as well as the Draft Habitats Regulation Assessment). In addition, the policy concept already exists in existing policy (which is a material planning consideration) including regional marine policy (UK Marine Policy Statement/draft Marine Plan for Northern Ireland) and the SPPS (paragraph 6.50 in particular.) Suggested minor change at para. 11.44, page 255 "...policy provisions set out in this policy, all development proposals which affect or might affect the whole or any part of the marine area (which includes the Belfast Lough Coastal Policy Area) will also be assessed against the provisions within the UK Marine Policy Statement and the"
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 42	NIEA (NED) considers an additional sentence should be added to this paragraph as follows: - "Any such proposals should comply with BS5837: 2012 'Trees in Relation to Design, Demolition and Construction - Recommendations'".	Additional sentence to be added to Policy DM 42.1.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The contents of Policy DM 42 should be read together and it is clear from Policy DM 42.4 that BS5837: 2012 'Trees in Relation to Design, Demolition and Construction - Recommendations' should be taken into account in the consideration of any development proposals.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 42	NIEA (NED) considers the full title of the British Standard should be given i.e. 'BS583 (2012): Trees in Relation to Design, Demolition and Construction - Recommendations'.	Amend to include the full title of the British Standard.	A list of typographical errors is set out in the Council's published Draft Plan Strategy Public Consultation Report.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 45	NIEA (NED) advises that Policy DM 45 does not take adequate account of policy laid out in SPPS (para.6 .224) and PPS 2. In its present form, these policies weaken the protection given under SPPS and PPS 2.	Recommend removal of the words "or address" from Policy DM 45.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The policy clearly indicates that renewable energy development should be compatible with policies to safeguard and enhance natural heritage and historic environment as well as not bringing forward any adverse impact on other relevant matters, such as public safety or residential amenity. All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and Para. 1.5. As such it is not considered that the policy weakens the protection afforded to the natural heritage through Section 11 of the DPS. The Council notes that Policy SP 1.1 states, "When considering individual development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the Strategic Planning Policy Statement (SPPS)". SP 1.4 states,, "...the Council will require developers to provide impact assessments in association with planning applications where this is necessary to allow proper consideration of the impacts of the development and any mitigation measures proposed".
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SP 10	NIEA (NED) considers that no consideration has been given to risks from potential groundwater flooding. Issues appear to be linked only to surface waters or Belfast Lough.	Policy consideration given to risks from potential groundwater flooding.	No change required. The Council considers that the flood risk policies as drafted are appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text, "Why we have taken this approach". If and when further information becomes available in relation to groundwater flooding this matter can be addressed through the normal Development Management process, including consultation with DfI Rivers.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	DM 52	NIEA (NED) considers Policy DM 52 only references risks to human health receptors from contamination. Early developer engagement relating to contaminated land issues - Policy encourages developers to engage early on with relevant council Environmental Health (EH) teams regarding human health receptors only. Considers the scope needs widened out. Need for Remediation Strategy and associated Verification Reports. Pre requirements to be agreed before a site is suitable for use. Considers the policy only references 'ground' contamination. No mention of 'groundwater' contamination which is a remit of DAERA/NIEA to manage/regulate. Policy relates to human health risks and does not reflect potential risks to the environmental/environmental receptors.	Risks to environmental receptors should be reflected i.e. groundwater, rivers, lakes etc. Widen engagement process to include council EH teams and DAERA/NIEA. Need for a Remediation Strategy and associated Verification Reports (in addition to a site investigation and risk assessment). Need to include reference groundwater contamination (within remit of DAERA/NIEA).	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The policy when read as a whole adequately addresses ground water and environmental issues, alongside human health impact. Requirement for a Remediation Strategy and associated Verification Report are matters for the Development Management process which is indicated in 13.54 and is normally dealt with by means of appropriately worded planning conditions following consultation with relevant statutory authorities.

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Papers	<p>NIEA (NED) notes that the Plan's evidence papers reference the Marine Plan and Marine Policy Statement as the key documents planning authorities must use for their responsibilities within the Intertidal Area.</p> <p>This is incorrect. The Marine Plan for NI once adopted and the UK MPS are the key documents where decisions affect or might affect the marine area. This is not solely restricted to the Intertidal Area, as Council decisions outside the Intertidal Area can impact on the marine area. This should be applied in Development Management and Enforcement decisions.</p>	No specified modification.	<p>The Council considers that, when the Plan and its supporting evidence base are read in their totality, sufficient policy provision has been provided for the marine area.</p> <p>In addition the provisions of the SPPS and legal duties under the relevant legislation apply. The Council considers that the comments raised have no impact on the soundness of the draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p> <p>The Council is however open to minor change for the purpose of clarification, to introduce text relating to Marine issues within the body of the DPS.</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division)	All Evidence Papers	<p>NIEA (NED) requests that all evidence papers are reviewed to ensure full regard has been taken of the objectives of common policy areas, the framework for economic, social and environmental considerations, the pressures and impacts of key activities and the principles for decision making contained within the UK MPS as required by marine legislation are covered.</p>	No specified modification.	<p>The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for the policies within the DPS and that marine was considered.</p> <p>In addition the provisions of the SPPS and legal duties under the relevant legislation apply. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p> <p>The Council is however open to minor change for the purpose of clarification, to introduce text relating to Marine issues within the body of the DPS.</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 5: Tourism	<p>NIEA (NED) considers that Evidence Paper 5: Tourism should give appropriate reference to marine policy documents and legislation, as salmon (given salmon fishing is mentioned) rely on marine waters over their lifespan.</p>	No specified modification.	<p>The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality, this includes Evidence Paper 5: Tourism as well as the "Introduction" and "Why we have taken this approach" for Strategic Policy 2. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p> <p>The Council is however open to minor change for the purpose of clarification, to introduce text relating to Marine issues within the body of the DPS.</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 7: Historic Environment	<p>NIEA (NED) considers the Plan should include a reference to marine policy documents and legislation given the acknowledgement of maritime wrecks.</p>	No specified modification.	<p>The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 7. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p> <p>The Council is however open to minor change for the purpose of clarification, to introduce text relating to Marine issues within the body of the DPS.</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division)	Evidence Paper 11: Public Utilities	<p>NIEA (NED) considers that Evidence Paper 11: Public Utilities should include a reference to the UK MPS and the draft Marine Plan for NI (if appropriate), given the potential impact on marine, coastal and transitional waters, from the outfall from waste water treatment (from Whitehouse WWTW) into Belfast Lough. Considers it important given the acknowledgement that this facility will be 'at or reaching capacity' with a 15% growth factor.</p>	<p>Amend Evidence Paper 11: Public Utilities to include reference to the UK MPS and the draft Marine Plan for NI (if appropriate).</p>	<p>The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality for Strategic Policy 3. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers.</p> <p>The Council is however open to minor change for the purpose of clarification, to introduce text relating to Marine issues within the body of the DPS.</p> <p>The Council has liaised with NIW in the preparation of the DPS and will continue to do so. In addition the DPS recognises capacity issues into consideration (para 2.84) as well as in its supporting evidence papers (e.g. 2 and 11).</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 14 :Flooding	<p>NIEA (NED): Evidence Paper 14: Flooding should mention marine policy documents and legislation given both the UK MPS and draft Marine Plan for NI contain policy on flooding and coastal flooding which is recognised in the evidence paper.</p>	No specified modification.	<p>The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for the policies within the DPS and that marine was considered.</p> <p>In addition the provisions of the SPPS and legal duties under the relevant legislation apply. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p> <p>The Council is however open to minor change for the purpose of clarification, to introduce text relating to Marine issues within the body of the DPS.</p>

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 16: Landscape Character Assessment	NIEA (NED) supports the Council's Landscape Character Assessment as defined in Evidence Paper 16: Landscape Character Assessment. Considers that the methodology used is sound and that it will be a valuable tool when considering the merits of development proposals and/or development pressure within the Borough.	No specified modification.	Support noted and welcomed.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 16: Landscape Character Assessment	Evidence Paper 16: Landscape Character Assessment: NIEA (NED) considers the LPP stage of the LDP process should include mention of the perceptual and aesthetic elements as key characteristics in line with the LCA Landscape Wheel.	No specified modification.	No change required. The Council considers that when the Plan and all its evidence base is read in totality that there is sufficient evidence for the policies in the DPS. The Council notes that NIEA request certain matters be considered at the Local Policies Plan stage. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and will give consideration to these matters at the Local Policies Plan stage.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 16: Landscape Character Assessment	NIEA (NED) considers that reference should be made to marine policy documents and legislation given the acknowledgement of the Seascape Character Assessment. The Council to note that 'seascape' is a policy area within the UK MPS and draft Marine Plan.	No specified modification.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for the policies within the DPS and that marine was considered. In addition, the provisions of the SPPS and legal duties under the relevant legislation apply. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage. The Council is however open to minor change for the purpose of clarification, to introduce text relating to Marine issues within the body of the DPS.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 16: Landscape Character Assessment	NIEA(NED) have outlined numerous suggested spelling and grammar amendments.	List of errors and amendments received.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 8. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 16: Landscape Character Assessment	NIEA (NED) notes that all NILCA 26 council area booklets were published in 1999. There was an overall analysis booklet published in 2000. Considers the Council may wish to clarify this.	No specified modification.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 8. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 16: Landscape Character Assessment	NIEA (NED) notes that the NIRLCA wasn't an update on the 1999 NILCA. It brought NI into line with the other UK agencies who already had their regional scale LCAs carried out. The 2015 draft referred to was published in Feb 2016.	No specified modification.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 8. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 16: Landscape Character Assessment	NIEA (NED) cannot see any reference to the analysis of the study that led to the conclusion that it 'Showed that boundaries of the NILCA 2000 are still adequate and fit for purpose to cover landscape of the Borough.' NED query was this a separate piece of work?	No specified modification.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 8. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document. Section 8 of Evidence Paper 16: Landscape Character Assessment (page 19) sets out the updated baseline methodology, including a Baseline Desktop Study and Audit of Existing LCAs. An example of a completed desktop study is included within Appendix 2 of the Report. The Council's approach was endorsed and signed off by a critical friend in the process, Soltys Brewster Consulting, Chartered Landscape Architects.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Evidence Paper 16: Landscape Character Assessment	NIEA (NED) recommends that the term 'landscape approach' is avoided as its considered open to interpretation. An alternative definition such as 'an approach which focuses on the protection of our most valued landscapes' or similar is preferred.	No specified modification.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 8. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document. Evidence Paper 16: Landscape Character Assessment clearly states the approach used by the Council.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Draft HRA	NIEA (NED) appreciates the effort made to proof the DPS against likely significant effects on designated European sites. Support noted for how the dHRA has been set out. The criteria used to screen European sites for the likely significant effects and Test of Likely Significance is sound and that the type of likely potential impacts have been sufficiently covered. Notes the sites screen in for further assessment. Notes the conclusion of the dHRA that DPS wont adversely affect the integrity of the sites listed.	No specified modification.	Support from NIEA (NED) on the dHRA is noted and welcomed.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Draft HRA	NIEA (NED) refer to Page 8 of the dHRA which states 'The view could be taken that, given that Policy DM 37 is included to meet the requirements of the SPPS, and that all planning applications must comply with the requirements of the Habitats Regulations, then the DPS cannot result in an adverse effect on the integrity of any international site'. NIEA (NED) considers this view or opinion not only subverts the legal process, but would absolve the Plan from the necessary scrutiny to ensure protection of European sites and soundness of the Plan. Therefore Policy DM 37 cannot be used to defer the assessment further down the permitting process.	NIEA (NED) requests the following sentence should be removed: "The view could be taken that, given the Policy DM 37 is included to meet the requirements of the SPPS, and that all planning applications must comply with the requirements of the Habitats Regulations, then the DPS cannot result in an adverse effect on the integrity of any international site".	The Council notes NIEA (NED) comment on the wording on page 8 of the dHRA in relation to Policy DM 37. The wording of this section will be updated in the final version of the HRA to clarify this matter.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Draft HRA	NIEA (NED) welcomes Policy DM 15.2 in respect of development relying on Non-Mains Sewerage. Considers that the dHRA does not appear to address the issue of existing provision of WWTWs in the Borough.	No specified modification.	The Council notes NIEA's (Natural Heritage Division) comments the dHRA in relation to WWTW. WWTWs are referred to in several places e.g. paragraph 4.2, page 18 of the dHRA - 'There is insufficient infrastructure or network capacity to treat wastewater in some settlements which will be a constraint on development. Alternatives to mains sewerage will have to be assessed by the appropriate competent authority'. Recommendation 7 specifically addresses wastewater: 'Wastewater Treatment: Land release should be phased to ensure alignment of housing delivery with planned infrastructure investment and development lead-times. New development cannot proceed until there is evidence of adequate wastewater treatment infrastructure or alternative treatment facilities.' The Council will continue to liaise with NIW in the zoning of sites for development at the LLP stage. HRA will also be carried out at the LLP stage.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Draft HRA	NIEA (NED) notes that a number of bird species are identified as having 'No Pathway to Plan Area'. It is unclear what this signifies as these species occur at several coastal SPAs and have the capacity to fly between sites.	No specified modification.	The Council notes NIEA's (NED) comments on the dHRA and bird species. The context 'pathway' refers to a pathway for an effect such as ecological pathways, as explained on page 18. Whilst it is correct that these are mobile species, the Plan Strategy cannot affect supporting habitat for these species therefore there is no pathway for an effect. In finalising the HRA this will be clarified.

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Draft HRA	In terms of the Outcome and Recommendations of the HRA, pages 98 - 103, NIEA (NED) requests that these are incorporated into the DPS to make it compliant with the Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended).	NIEA (NED) requests that the Recommendations are incorporated into the DPS.	The Council notes the comments by NIEA (Natural Heritage Division) in relation to the dHRA and Outcomes and Recommendations. It is noted that DAERA accepts the recommendations of the draft HRA. These identify how the requirements of the Habitats Regulations will be met throughout the LDP. This will be through a number of mechanisms including the finalisation of the HRA for the Plan Strategy and preparing for the LPP stage and the application of policy through the Development Management process.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Draft HRA	Strategic Policy 9 is referred to on page 24 of the dHRA. On page 262 of the DPS, Strategic Policy 9, SP9.2 (c) articulates a presumption against minerals development unless it can be demonstrated that there is a 'regional need that outweighs the importance of sites of nature conservation importance. This includes 'international' sites. NIEA NED consider Policy 9.2c is somewhat misleading as the Habitats Regulations would supersede this policy.	No specified modification.	The Council notes NIEA's (Natural Heritage Division) comments in relation to DPS Policy SP 9.2c being misleading as the Habitats Regulations would supersede this policy. No change required to the DPS or assessment. The Council considers the policy drafted as appropriate and reasonable. All policies of the plan should be read together. This is made clear under Policy SP 1 and Positive Planning Note on page 11 of the DPS. SP 9.2 c should be read alongside all policies in the plan including SP 1.4, DM 37 and DM 43. Legislative provisions as set out in the Habitats Regulations will also apply. .
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Draft HRA	NIEA (NED) note that the DPS states that NIW has identified Cranfield and Moneyglass WWTW as having no capacity and Whitehouse WWTW will reach capacity with a 10% growth rate in population. NIEA (NED) considers that in terms of identifying new housing land, there does not appear to have been an assessment of housing allocation against WWTW capacity.	No specified modification.	As previously stated the dHRA has considered WWTW capacity and housing was considered at the strategic level along with development management policies (refer to Appendix 5 of the report). The Council will continue to liaise with NIW regarding the zoning of sites at the LLP stage which will also be subject to HRA.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	Miscellaneous	NIEA (NED) considers the Council should use the Planning Advisory Service 'Soundness Self-Assessment Checklist' as a basis to ensure soundness of the plan with respect to the NI marine area. To note, the Celtic Seas Partnership produced 'Good Environmental Status' (2016).	No specified modification.	Noted.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	NIEA (NED) considers in general, the DPS document is well laid out and easy to follow.	No specified modification.	Support From NIEA (NED) on the SA Report noted and welcomed.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	NIEA (NED) considers there is limited reference to the effects on the marine area and marine aspects within the appraisal. Only 'limited effects' on the marine area have been identified, including those in relation to the potential secondary, cumulative and synergistic effects. Sustainability objectives make no reference to the marine area or marine aspects. It is not clear if coast references includes effects on the marine area beyond the low water mark.	Effects on the marine area and marine aspects could have been drawn out more had there been an explicit Sustainability Objective for the marine area.	The comments from NIEA (NED) in relation to the SA Report and limited reference to effects on the marine area and marine aspects within the appraisal are noted. It is acknowledged that the specific term 'the marine area' has not been included in the appraisals recorded within the SA Report, however this is more a reflection of the language used in the appraisals themselves rather than an absence of consideration of how policies / policy options may affect or impact the inshore region. For relevant policies the appraisals have made reference to potential effects or impacts on the 'coastal zone', 'coastal areas', 'coastal views', 'coastal waters' and other similar terms and wider issues such as sea level rise, which do indicate that the marine area was a consideration during the appraisal process. The SA Scoping Report has also examined a wide range of marine and coastal aspects in its evidence base reported in Chapter 5, which also informed the discussions occurring during the appraisal of options. For LPP SES will review the Key Sustainability Issues and Appraisal Prompts to ensure that they adequately direct the appraisal discussions for relevant policies or policy options. This may aid in ensuring that the reporting of effects on the marine area uses appropriate terminology and is more clearly identifiable in the SA Report.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	NIEA (NED) considers there is no reference to the consideration of policy within the UK Marine Policy Statement (MPS) or the Draft Marine Plan for NI in assessing policy documents. It appears that only terrestrial planning policy documents have been considered at these stages.	More prominence could be given to the UK MPS within the appraisal, its introduction and strategic context of the SA Report.	The comments from NIEA (NED) in relation to the Sustainability Appraisal and consideration of the UK MPS/Draft Marine Plan for NI are noted. No change required. The requirement to have regard to the UK MPS and (when published) the Marine Plan for NI is reported in Section 1.2 of the SA Report. This requirement is mirrored in section 4.3.5 of the SA Scoping Report. Additional details are also included in SA Scoping Report Chapters 5.11 and 5.12 in respect of the relationship with water and natural resources, as well as in Appendix 4 of the SA Scoping Report.

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	Policy DM 9: NIEA (NED) notes Policy DM 9.1 - 9.10 and questions whether the scoring of Option 1 against Sustainability Objectives 11 and 12 as neutral / no effect accurately reflects the potential of tourism development at sites of landscape and natural heritage.	Suggests consideration should be given to an 'uncertain' score.	The comments from NIEA (NED) in relation to the SA Report and the scoring of Policy DM 9 are noted. Appendix 4 of the SA sets out the reasoning for the policy scoring. The rescoring of the policy as requested does not impact on the policy as set out in the DPS. All policies of the Plan should be read together and as such, there are a number of other policies in the Plan in relation to the natural environment that will be a consideration in the determining of development proposals. A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	Policy SP 4: Homes (Housing Allocation). NIEA (NED) notes significant impacts are identified on water resources for Option 2 as there could be exceedance of WWTW capacity. Preferred Option 3 scores minor negative effect on Sustainability Objective 12. If this is in part also due to exceedance of WWTW capacity, has the phasing of housing development to meet WWTW improvement been considered? How do these negative impacts relate to the HRA?	No specified modification.	The comments from NIEA (NED) on WWTW and capacity are noted. At the DPS stage the Council has proposed a strategic housing allocation and has considered the issue of WWTW in Evidence Paper 2 : Settlement Evaluation and Evidence Paper 6 : Housing. The Council also engaged with NIW in advance of publication and has received no objection from NIW in their representation (Ref: LA03/DPS/0062). A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming LPP, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy. The Council has indicated in the DPS at para 7.17 that the majority of housing is likely to be delivered through existing housing commitments. The Scoping Report and SA Report will also be updated at this stage. Any additional measures in terms of connection will be dealt with through the normal Development Management process. A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. In addition, the SA and LDP will be monitored. The comments in relation to the HRA are dealt with under NIEA's response to the document.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	SP 4: Homes (Housing Allocation). NIEA (NED) considers measures to reduce negative effects include the use of KSRs. In the case of prospective development of brownfield sites, KSRs could be used to mitigate adverse impacts to NI priority habitat: Open Mosaic Habitats on previously developed land.	No specified modification.	The comments from NIEA (NED) on the SA Report and measures to reduce negative effects for the allocation of housing in SP 4 are noted. The establishment of KSRs to avoid or mitigate adverse impacts will be a consideration in the SA of the LPP.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	Policy DM 18: NIEA (NED) questions whether the scoring of Sustainability Objective 12 (pg. 44 of SA) as 'neutral / no effect' accurately reflects the potential of housing in the wider countryside to negatively impact natural heritage and whether an 'uncertain' score may be more accurate.	No specified modification.	The comments from NIEA (NED) in relation to the SA Report and scoring of Policy DM 18 are noted. Appendix 4 of the SA sets out the reasoning for the policy scoring. The rescoring of the policy as requested does not impact on the policy as set out in the DPS. All policies of the Plan should be read together and as such there are a number of other policies in the Plan in relation to natural heritage which will be a consideration in the determining of development proposals. A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. In addition, the SA and LDP will be monitored.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	Policy DM 37: NIEA (NED) agree with the SA in relation to Policy DM 37.1 to DM 37.5, international designations, national and local designations/reserves.	No specified modification.	The Council notes and welcomes support from NIEA (NED) in relation to Policy DM 37.1 to DM 37.5.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	Policy DM 38: The requirement for 'evidence' of protected species to determine the need for the developer to carry out protected species surveys as suggested in the amplification (DPS, para.11.27) is not in the spirit of PPS 2 or the SPPS in that the potential for protected species should be enough to require protected species surveys to be carried out. The use of the word 'evidence' may suggest that the Council should provide the evidence before asking for surveys when in effect the surveys are the 'evidence'. As such, NIEA (NED) would not agree with the SA.	NIEA NED has concerns regarding the inclusion of the word 'evidence', and strongly suggest that the word 'evidence' is changed to 'potential'.	The comments by NIEA (NED) in relation to Policy DM 38 and para.11.27 are a DPS matter and are addressed under NIEA's DPS Representation.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division)	SA	Policy DM 39.1: NIEA (NED) considers the omission of the words 'or damage' has the effect of weakening the regional policy PPS 2 Policy NH 5. Considers 'Unacceptable adverse impact of damage' is a stronger text.	Suggests the use of the term 'unacceptable adverse impact of damage'.	The comments by NIEA (NED) in relation to Policy DM 39.1 is a DPS matter and is addressed under NIEA's DPS Representation.

LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	Policy DM 39: Regarding Policy DM 39.2, the comments in relation to Policy DM 38 regarding the use of the word 'evidence' again apply. NIEA (NED) considers that this weakens the policy and is not in the spirit of PPS 2 and the SPPS. Whilst NIEA (NED) state they do not agree with the SA in its current form, they note that if the proposed wording change was undertaken, they would change their position to acceptability of the SA.	NIEA (NED) has concerns regarding the inclusion of the word 'evidence', and strongly suggest that the word 'evidence' is changed to 'potential'.	The comments by NIEA (NED) in relation to Policy DM 39.2 is a DPS matter and is addressed under NIEA's DPS Representation.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	Policy SP 9: NIEA (NED) refer to Policy SP 9.2 (c) in relation to International Sites and presumption against minerals development. NIEA (HED) advise that this is misleading as the Habitats Regulations would supersede this policy. NIEA (NED) would be of the opinion that the policy as expressed may therefore require a negative scoring against Sustainability Objective 12.	No specified modification.	<p>The Council notes NIEA's comments in relation to DPS Policy SP 9. 2 (c) being misleading. This was not raised in their original DPS Representation. It is also noted that NIEA request a rescoring of the policy as drafted.</p> <p>The Council considers the policy as drafted as reasonable and appropriate. All policies of the plan should be read together. This is made clear under Policy SP 1 and Positive Planning Note on page 11 of the DPS. There are a number of policies in the plan in relation to the natural environment and requirements for habitats assessment.</p> <p>A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. In addition the SA and LDP will be monitored.</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	Policy DM 45: NIEA (NED) considers the words 'or address' are contrary to SPPS para. 6.224 which states: "Development that generates energy from renewable resources will be permitted where the proposal and any associated buildings and infrastructure, will not result in an unacceptable adverse impact on the following planning considerations.....Biodiversity, nature conservation or built heritage interests".	No specified modification.	The comments from NIEA (NED) in relation to the SA Report and the wording of Policy DM 45 are noted. The wording of Policy DM 45 is a DPS matter and the matter is addressed under NIEA's DPS representation.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division) (NED)	SA	Policy DM 4: NIEA (NED) notes and commends Policy DM 4.4 in relation to ammonia production, which will help reduce the risk of adverse impacts.	No specified modification.	Support from NIEA (NED) in relation to the SA Report and DM 4 are noted and welcomed.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division)	SA	NIEA (NED) considers the wide range of LDP topics has the potential to have a significant impact on the environment.	NIEA (NED) has provided a generic list of suggested measures, which could be used for monitoring. (Note: Due to the length of detail please refer to original response for details).	The Council notes NIEA (NED) comments on monitoring. Both the SA and the LDP contain indicative frameworks for monitoring. This will continue to develop as progress is made on the LDP and will be undertaken following adoption.
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division)	DM 53	<p>NIEA (NED) indicates that Policy DM 53.1 states that proposed waste facilities need to demonstrate that there is a local need for the project and advise that some existing and future facilities will potentially address regional or national waste management requirements.</p> <p>Policy DM 53.7 states that all waste processing must be within a building unless it is 'necessary' for the works to be out in the open. However, current scrap yards and MRFs for inert conduct most waste processing operations in the open and it is important that the policy does not restrict these type of operations.</p>	No specified modification.	<p>No change required. The Council considers that the waste policies as drafted are appropriate and reasonable and have taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text, "Why we have taken this approach".</p> <p>Policy DM 53 is not restricted to proposals where there is an established local need. It also states broad support for proposals that would meet a need established through the Council's Waste Management Plan. In relation to Policy DM 53.7 and as the NED response acknowledges, the policy does not preclude waste processing operations in the open where it can be demonstrated that this is necessary.</p>
LA03/DPS/0102	DAERA (NIEA- Natural Environment Division)	DM 54	Policy DM 54: NIEA (NED) welcomes this policy which should prevent other developments being located too close to existing waste facilities.	No specified modification.	Support noted and welcomed.

LA03/DPS/0103	RSPB NI	SP 1	RSPB NI welcomes the Council's commitment to produce a range of supplementary guidance and advice notes as necessary to support the sustainable development of the Borough. These notes should be produced in a timely fashion alongside the publication of the Plan strategy and should not only support sustainable development but actively further it, consistent with the SPPS. The plan should take account of the RDS and SPPS.	No specified modification.	Support noted and welcomed. The Council will bring forward a range supplementary planning guidance in due course which will be subject to a period of public consultation.
LA03/DPS/0103	RSPB NI	DM 9	RSPB NI considers that the LDP should steer tourism related development away from sensitive areas. It is recommended that the full provisions of SPPS para. 6.266 are carried over to the Plan Strategy.	Add additional criterion to Policy DM 9.10 as follows, '(f) the safeguarding or enhancement of an existing or planned public access to the coastline or other tourism access will be a particular consideration when assessing proposals for tourism development.'	Open to minor change. The Council is suggesting the following minor change in response to the representation to clarify that, in bringing forward proposals for new tourism development, access to tourism assets should be safeguarded or enhanced. This is not a new policy concept. Policy DM 9.10 itself indicates that the development should be compatible with policies to safeguard and enhance the historic environment and natural heritage which comprise the key tourism assets of the Borough. Furthermore, it is clear when the DPS and its evidence base are read together that the DPS already establishes the importance of pedestrian and cycle access/linkages in SP 3.5, SP 3.6, DM 12 and DM 25. In addition, the Council is aware of its duties under Article 3 of the Access to the Countryside (NI) order 1983 in relation to public rights of way. Suggested minor change at DM 9.10, page 105. Add the following additional criteria: "(f) existing or planned public access to tourism assets, including landscape features and the coast, are safeguarded or enhanced."
LA03/DPS/0103	RSPB NI	DM 14	RSPB NI considers that Policy DM 14.1 (c) as proposed, effectively raises the threshold with regards effects on local amenity and the environment by introducing a 'significant adverse' impact test. There is no justification in regional policy for the raising of an accept(able) level of impact on the environment.	Policy DM 14.1 (c) to be amended to read "(c) the proposal will not have an impact on local amenity or the environment."	Open to minor change. The Council is suggesting the following minor change in response to the representation to clarify that the assessment of impacts that may arise in association with Public Utilities and Infrastructure proposals requires consideration of whether these are considered acceptable or not having regard to the overall degree of impact arising and any mitigation measures proposed. This does not introduce a new policy concept rather it forms part of the normal Development Management process of a balanced consideration of proposals which assesses whether a development would result in demonstrable harm to interests of acknowledged importance that is not outweighed by the benefits associated with the scheme. As such the clarification suggested is supported by the core approach to sustainable development set out in SP 1 of the DPS and the approach advocated in the SPPS. Suggested minor change at page 126, Policy DM 14.1(c) "The Proposal will not have an unacceptable adverse impact on local amenity or the environment".
LA03/DPS/0103	RSPB NI	DM 14	RSPB NI suggests that the opportunity to bury electricity lines should be explored where feasible.	No specified modification.	Noted.
LA03/DPS/0103	RSPB NI	SP 4	RSPB NI suggest that details within Evidence Paper 6: Housing indicate that there is a real danger that the District's housing growth figure of 9,750 units could be far exceeded during the plan period. Considers that there is profound tension between delivering ever-increasing amounts of housing and safeguarding finite environmental capacity. Housing and infrastructure require a high degree of land take, while increased local populations resulting from new housing development increase pressure on local eco systems.	The potential housing yield of the Borough needs to be more closely aligned with the Plans stated HGI figure of 9,750 units in order to more effectively align with the sustainable development principles contained in the RDS and SPPS.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. The Council has also been open in its indication (see para. 7.14 and Evidence Paper 6: Housing) that potential for housing delivery, due to the level of commitments, will likely be in excess of this figure and in general housing growth will be fulfilled by land within existing settlement limits. The inclusion of the wording 'at least' in policy SP 4.2 acknowledges this situation.
LA03/DPS/0103	RSPB NI	SP 4	As outlined in POP response, RSPB NI cautioned against the carrying over of unimplemented zonings into new plan. A fresh approach with sustainability at the heart of the process be employed where older unimplemented zonings are revisited. Considers that the present approach inhibits the ability to achieve the brownfield target in circumstances where there will only be minimal requirement for additional land in the Local Policies Plan.	The DPS should be revisited to examine how larger settlements can fulfil the 60% brownfield target, prior to the retention/identification of other greenfield zonings/new sites. This will also have the effect of reducing the overall housing potential which is exhibits a unsustainable surplus.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken into account the provisions of the RDS and SPPS. The rational for the strategic policy is provided by the text "Why we have taken this approach". As indicated in para 7.17 and 7.18 of the DPS, should additional housing land be required at Local Policies Plan stage, the identification of sites will be undertaken in line with RDS policy and the direction included within the SPPS. Whilst it is the Councils indicated in its published POP that in general unimplemented housing zonings would be carried forward from extant plans into Local Development Plan 2030 this was in large part predicated on the fact that the majority of such zonings are currently the subject of extant or commenced permissions and this remains the case. Topic Paper 1: Housing Growth includes an updated position on the status of legacy housing zonings across the Borough.
LA03/DPS/0103	RSPB NI	SP 4	RSPB NI indicates that para 7.17 of the DPS states that the plan will seek to apply the 60% brownfield requirement to all settlements over 5,000 units. This effectively raises the bar of its application.	Para 7.17 be amended to 5,000 population.	Noted. A list of typographical errors is set out it the Council's published Draft Plan Strategy Public Consultation Report.

LA03/DPS/0103	RSPB NI	DM 17	RSPB NI identifies examples of partnership working to deliver new standards for wildlife friendly housing schemes. The Council needs to be more ambitious in setting targets for new public open space provision in new residential developments if it is to further sustainable development and the preparation of the LDP presents the council with a real opportunity to deliver on its responsibility to further sustainable development and conservation of biodiversity.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that the inclusion of policies in relation to open space provision, as well as Placemaking and Good Design, Natural Heritage and Environmental Resilience and Protection within the draft Plan Strategy, will support and enhance sustainable development and biodiversity.
LA03/DPS/0103	RSPB NI	DM 18	RSPB NI indicate that references to environmental considerations in the location, siting and design of dwellings in the countryside within the POP have not be carried through to the DPS. Policy DM 18.2 singles out adverse impact on the landscape character or rural amenity of the countryside as reasons for refusal. Para 7.74 outlines that all new dwellings in the countryside should be in accordance with DM 27 however RSPB NI advise that there is no reference to environmental considerations in DM 27.	Policy DM 18.1 should be amended to include a reference to natural heritage as follows. ' with other relevant policies and provisions of the LDP including natural heritage'. Such an inclusion would make the generic homes in the countryside consistent with DM 2: Economic Development in the Countryside which also highlights the need for environmental considerations.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Additional wording is unnecessary given that all relevant policies of the Plan, including those pertaining to natural heritage should be read together. This is made clear in Policy SP 1 and Positive Planning Note on page 11.
LA03/DPS/0103	RSPB NI	DM 18 B	RSPB NI indicates that Policy DM 18B requires proposals to also accord with Policy DM 27, however Policy DM 27 does not have any regard to the importance of old buildings and underused sites for biodiversity. RSPB NI believes that any redevelopment proposals should aim to protect and enhance biodiversity on sites and enhance connections between ecological features within and across sites.	Policy DM 27 should include a further requirement - result in no net loss of biodiversity.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided by the text "Why we have this Policy". The Council considers that there is sufficient reference to the maintenance and promotion of biodiversity in the Plan Strategy, including suggested minor changes, which must be read as a whole.
LA03/DPS/0103	RSPB NI	DM 18 F	RSPB NI indicates that Policy DM 18F requires proposals to also accord with Policy DM 32, however Policy DM 32 does not have any regard to the importance of old buildings and underused sites for biodiversity. RSPB NI considers that any redevelopment proposals should aim to protect and enhance biodiversity on sites and enhance connections between ecological features within and across sites.	Policy DM 32 should include a further requirement - result in no net loss of biodiversity.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided by the text "Why we have this Policy". The Council consider that there is sufficient reference to the maintenance and promotion of biodiversity in the Plan Strategy, including suggested minor changes, which must be read as a whole. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.
LA03/DPS/0103	RSPB NI	DM 24	RSPB NI request that the wording of Policy DM 24 should be cross-referenced with the need to comply with Policy DM 27 Rural Design and Character, in order to meet the policy requirements of the SPPS with regards to development in the countryside, as set out in SPPS para. 6.61 onwards.	Policy DM 24.3 should be cross-referenced with the need to comply with DM 27 Rural Design and Character.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". Additional wording is unnecessary given that all relevant policies of the Plan should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.
LA03/DPS/0103	RSPB NI	DM 25	RSPB NI welcomes the inclusion of landscape and biodiversity at Policy DM 25.2. RSPB NI recognises that those measures under the heading of Policy DM 25 will play a significant role in helping people and wildlife adapt to climate change. RSPB NI recommends that further details on how to increase biodiversity within developments should be contained within Supplementary Planning Guidance. RSPB NI suggests supplementary planning guidance on design, to outline further details on how to increase biodiversity in developments and provides examples of supplementary planning guidance to be drawn upon.	No specified modification.	Support noted and welcomed. The Council considers that the Plan Strategy encourages the promotion of biodiversity (see also suggested minor amendments). Evidence Paper 21: Placemaking and Good Design sets out the evidence base in relation to the topic within the Borough and includes a summary of the 'Living Places Urban Stewardship and Design Guide', supplementary planning guidance. This guidance incorporates an understanding of how good design and successful places can meet the challenges of increasing diversity and as set out in Policy DM 25.2, all development proposals should demonstrate how they have taken this guidance into account. The Council will consider the advice and information provided by RSPB in bringing forward future supplementary planning guidance.

LA03/DPS/0103	RSPB NI	DM 25	RSPB NI state that the LDP should be more ambitious in delivering for and furthering biodiversity, consistent with the RDS, SPPS, Section 1 of the WANE Act (NI) 2011, NI Biodiversity Strategy and EU Biodiversity Strategy. RSPB NI state that the built environment should aim to be permeable to wildlife and to incorporate design which helps to sustain and increase particular species and habitats.	Suggest additional policy text - "Planning conditions will be used to require both extensions to existing properties and all new developments to provide sites for species that nest or roost in the built environment."	<p>Open to minor change.</p> <p>The Council considers that Policy DM 25 as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". There is no need to incorporate text regarding the use of planning conditions as this is a matter for the normal Development Management process.</p> <p>The Council is suggesting the following minor change in response to the representation in recognition of the important role of placemaking and good design in promoting biodiversity. This does not introduce a new policy concept. It is clear that when the DPS and its evidence base are read together that the Council is already seeking to promote biodiversity through the planning process (see Policies SP1, SP6, SP8, DM 25 and DM 39).</p> <p>There is also a statutory duty on the Council to further the conservation of biodiversity in the Wildlife and Natural Environment Act (NI) 2011, whilst the promotion of biodiversity is also recognised in other legislation, such as the Conservation (Natural Habitats, etc.) Regulations (NI) 1995. as well as in regional policy such as the RDS 2035 and the SPPS.</p> <p>Suggested minor change at Policy SP 6.2, page 184 "....respond to and enhance local character, help create a sense of place, reflect the distinctiveness of the unique Places of the Borough and assist in the promotion of biodiversity."</p>
LA03/DPS/0103	RSPB NI	DM 27	RSPB NI indicates that Policy DM 27 should include a requirement to achieve no net loss of biodiversity. It should reference biodiversity features which may be incorporated into the design and layout of development and refer to the use of planning conditions.	Amend policy text to achieve no net loss of biodiversity. Reference specific biodiversity features and include the following additional text , "Planning conditions will be used to require both extensions to existing properties & all new developments to provide sites for species that nest or roost in the built environment."	<p>Open to minor change.</p> <p>The Council is suggesting the following minor changes in response to the representation in recognition of the important role of rural design in promoting biodiversity. This does not introduce a new policy concept. It is clear that when the DPS and its evidence base are read together that the Council is already seeking to promote biodiversity through the planning process (see Policies SP1, SP6, SP8, DM 25 and DM 39).</p> <p>There is also a statutory duty on the Council to further the conservation of biodiversity in the Wildlife and Natural Environment Act (NI) 2011, whilst the promotion of biodiversity is also recognised in other legislation, such as the Conservation (Natural Habitats, etc.) Regulations (NI) 1995. as well as in regional policy such as the RDS 2035 and the SPPS.</p> <p>Suggested minor change at para. 9.20, page 192 "...integrate into their surroundings, assist the promotion of biodiversity and to protect the amenity..."</p> <p>Suggested minor change at Policy DM 27.5, page 194 "All proposals for development in the countryside will be expected to address biodiversity impact and be accompanied..."</p>
LA03/DPS/0103	RSPB NI	DM 32	RSPB NI advises that policy DM 32 has no regard to the importance of old buildings and underused sites for biodiversity.	Additional policy text to include, "Planning conditions will be used to require both extensions to existing properties & all new developments to provide sites for species that nest or roost in the built environment."	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers there is sufficient reference to the maintenance and promotion of biodiversity in the Plan Strategy, including suggested minor changes, which must be read as a whole. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.</p> <p>There is no need to incorporate text regarding the use of planning conditions as this is a matter for the normal development management process.</p>
LA03/DPS/0103	RSPB NI	DM 36	RSPB NI advises that Policy DM 36 has no regard to the importance of old buildings and underused sites for biodiversity.	Additional policy text to policy to include, "Planning conditions will be used to require both extensions to existing properties & all new developments to provide sites for species that nest or roost in the built environment."	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers there is sufficient reference to the maintenance and promotion of biodiversity in the Plan Strategy, including suggested minor changes, which must be read as a whole. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.</p> <p>There is no need to incorporate text regarding the use of planning conditions as this is a matter for the normal development management process.</p>
LA03/DPS/0103	RSPB NI	SP 8	RSPB NI indicates that references to 'RAMSAR' should read 'Ramsar' , as it is not an acronym. Considers that the Policy on natural heritage should include restoration and enhancement in a manner which reflects the Lawton principles - reference is made to 'The Making Space for Nature' report.	No specified modification.	<p>Noted. A list of typographical errors is set out in the Council's published Draft Plan Strategy Public Consultation Report.</p> <p>No change required in relation to the suggested inclusion of text relating to the Lawton Principles, as this matter is adequately dealt with under Policy SP 8.1. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p>
LA03/DPS/0103	RSPB NI	SP 8	RSPB NI indicates that paragraph 1.6 of PPS 2 Nature Conservation and paragraph 6.174 and 3.9 of the SPPS mention the precautionary principle. Planning authorities should apply the precautionary principle when considering the impacts of a proposed development on national or international significant landscape or natural heritage resources.	It is recommended that Policy SP 8.1 explicitly sets out its application of the precautionary principal in order to be consistent with existing policy i.e. PPS 2 and SPPS proposed textual changes 'ANBC will be guided by the precautionary approach that, where there are significant risks of damage to the environment, its protection will generally be paramount, unless there are imperative reasons of overriding public interest'.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council considers that there is sufficient reference to the precautionary principle within the DPS (see Policy 1.3), which must be read as a whole. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.</p>

LA03/DPS/0103	RSPB NI	SP 8	RSPB NI indicates that paragraph 6.198 of the SPPS states that 'Planning authorities should ensure that the potential effects on landscape and natural heritage, including the cumulative effects of development are considered.' Whilst amplification paragraph 11.38 makes provision for the consideration in respect of landscape, RSPB NI considers that there is nothing with regard to natural heritage per se, and this should be addressed. RSPB NI recommend that an additional criterion is added to Policy SP 8.2.	Additional criterion to SP 8.2 - '(f) ensuring that the potential cumulative effects of development are considered on landscape and natural heritage.'. This will allow policy SP 8.2 to be in general conformity with SPPS.	Open to minor change. The Council is suggesting the following minor change in response to the representation to clarify that adverse impact includes consideration of cumulative impacts. Consideration of adverse impact is already established in the policy and this would incorporate consideration of all potential adverse impacts arising. The suggested text simply clarifies what this entails. Consideration of cumulative impact is a material consideration and is included in the SPPS at paras 6.188 and 6.198. Suggested minor change at Policy SP 8.2(b), page 236 "...adverse impact of development, including consideration of potential cumulative effects."
LA03/DPS/0103	RSPB NI	DM 38	RSPB NI considers that policy DM 38.1 has changed the policy test with regards to European Protected Species. The test, as set out in legislation, is 'not likely to harm,' however the proposed wording of Policy DM 38.1 has effectively raised the impact threshold to 'have an adverse impact on'. As this test is set out in the Habitats Directive, it is not at the gift of the LDP to alter.	Policy DM 38.1 should be reworded as follows: - ' <i>Development that is not likely to harm a European Species...</i> ' to be consistent with the European legislation (Habitats Directive), which is currently reflected in both PPS 2 and SPPS paragraph 6.180.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council does not accept that the wording of the DPS policy is inconsistent with the legislative requirements.
LA03/DPS/0103	RSPB NI	DM 40	RSPB NI welcomes policy DM 40.6 in principle, however recommend that this area should include the ASSI/SPA/Ramsar designations at Lough Neagh and Lough Beg into the wider hinterland to buffer the protected area and provide space for nature to expand at a landscape scale. Whilst RSPB NI appreciates that there is already development in this buffer zone, and extant permissions are still likely to be implemented, and indeed future permissions still likely to be granted where policy criteria is met, RSPB NI consider that the identification of the buffer serves to highlight the special consideration required to be given to future development in this area.	RSPB NI recommend an area of 1km is identified from the edge of the protected area in order to allow nature a space to 'breathe' at the edge of the site designation as species do not necessarily confine themselves solely to the protected area.	Support for the Lough Neagh/Lough Beg SLPA noted and welcomed. It is considered that due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0103	RSPB NI	DM 40	RSPB NI identify a number of areas within the Borough to be identified as LLPAs - area between Ballyscullion Moss and Lough Beg, Fairs Bay Nature Reserve, Three Islands within the Lough Neagh ASSI and Rams Island appeal to the visitor in the area and the landscape. Toome village could be considered for sustainable development due to its strategic location on the banks of the Lower Bann River. The LDP should steer tourism related development away from sensitive areas, however RSPB NI appreciate the role that the natural landscape plays in attracting tourists. RSPB NI caution that where the landscape is a core part of the tourism offering that all related tourism developments are designed to be wholly sustainable, particularly for landscapes such as Lough Neagh & Lough Beg.	Identifies a number of areas within the Borough to be identified as LLPAs.	It is considered that due the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land. The Council considers that Policy DM 9, in conjunction with the other policies contained within the LDP, adequately deals with the issues raised in relation to the location of tourism related development and sensitive landscapes.
LA03/DPS/0103	RSPB NI	SP 9	RSPB NI are disappointed that a presumption against new or extended planning permission for peat extraction has not been included within the Council's DPS.	The following criterion is required to Policy SP 9.2, as follows: 'planning permission will not be granted for peat extraction for new or extended sites, or extant permissions renewed.' The following text should also be inserted with reference to peat extraction sites: 'For those sites currently being extracted, restoration plans should be in place, where the developer will need to demonstrate that the proposed management structures and finance are in place for the restoration of these sites. In such cases, a planning agreement between relevant parties may be required.'	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council would also advise that development impacting on active peatland is addressed in Policy DM 39. In addition Policy SP 9.2 (c) brings forward a presumption against minerals development on sites of local nature conservation importance that will be identified at the LPP stage, and which will include consideration of all the Borough's peatland sites. There is no need to incorporate the text proposed in relation to conditions or planning agreements for the restoration plans of peatland sites currently being extracted, as this is a matter that should, where appropriate, have already been addressed through the normal Development Management process.
LA03/DPS/0103	RSPB NI	SP 9	RSPB NI acknowledge Policy SP 9.2 (c), whilst it notes that not all peatlands falls within a designated site.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Policy SP 9.2 (c) brings forward a presumption against minerals development on sites of nature conservation importance, including local sites that will be identified at the LPP stage. This will include consideration of the Borough's peatland sites. Proposals for minerals development on any areas not identified at LPP stage will stand to be assessed on their individual merits through the normal Development Management process judged against the policies of the LDP and other material considerations.

LA03/DPS/0103	RSPB NI	DM 43	RSPB NI recommends that Policy DM 43 must require development proposals to contain details of sustainable restoration proposals, including the enhancement of biodiversity wherever possible.	Policy DM 43.6 should also include a requirement for 'any opportunities for enhancing biodiversity, community recreation and access to be considered.'	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Furthermore, this matter is adequately addressed in 12.17.
LA03/DPS/0103	RSPB NI	DM 43	RSPB NI considers the framework for restoration should facilitate regular inspection to ensure such plans are followed through to delivery. The delivery of Ballyscullion Moss peat extraction site restoration plan must be picked up and kept alive via the LDP. Sluggan Moss trial restoration site should be a reference site in advocating other peat extraction sites to follow suit in the years ahead.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that this is a matter for the normal Development Management process which incorporates the necessary enforcement of planning conditions/agreements.
LA03/DPS/0103	RSPB NI	DM 45	RSPB NI considers that whilst Policy DM 45.5 restricts wind turbines on active peatland, unless there are imperative reasons of overriding interest. Policy DM 45 does not accord with SPPS 6.226, which restricts any renewable energy development on active peatland. Further 'implementation' factors for consideration are included in 6.228 and 6.229.	The following text, applicable to all energy development, should be inserted: 'Any renewable energy development on active peatland will not be permitted unless there are imperative reasons of overriding public interest as defined under The Conservation (Natural Habitats, etc.) Regulations (NI) 1995 as amended. It will be necessary to consider the inter-relationship between both the above-mentioned considerations and other relevant policies within this plan.'	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The impact of development on identified features of the natural heritage, including active peatland, is adequately covered by the introductory text of Policy DM 45.1 and the policies set out in section 11 Natural Heritage of the DPS and in particular Policy DM 37. The DPS makes clear that all policies within the LDP should be read together. This is made clear in Policy SP 1, the Positive Planning Note on page 11 and again at para 1.5.
LA03/DPS/0103	RSPB NI	DM 45	RSPB NI recommends that Policy DM 45.2 should be amended as there is currently a policy gap within the DPS.	Additional text as follows: <i>'Where any project is likely to result in unavoidable damage during its installation, operation or decommissioning, the application will need to indicate how this will be minimised and mitigated, including details of any proposed compensatory measures, such as a habitat management plan or the creation of a new habitat. This matter will need to be agreed before planning permission is granted.'</i>	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy". This matter is adequately addressed in the Natural Heritage Policies and through the normal Development Management process.
LA03/DPS/0103	RSPB NI	DM 45	RSPB NI welcomes the requirement for repowering, or decommissioning and restoration. However, there is no detail on how repowering or decommissioning and restoration will be assessed.	The provisions that PPS 18 para. 4.17 require should be copied across. Suggested wording: 'Applications for the re-use, refurbishment, repair and repowering of existing renewable energy development in order to prolong the life span of developments such as wind farms and solar farms will have to be determined on their individual merit and in light of the then prevailing policy and other relevant factors including not resulting in unacceptable impacts on the environment or residential / visual amenity.' The amplification should also draw attention to the Conservation (Natural Habitats, etc) Regulations (NI) 1995 (as amended).	Open to minor change. The Council is suggesting the following minor changes in response to the representation to address a textual error in the amplification text under para.12.28 which refers to both repowering and decommissioning in the same sentence. The changes suggested do not introduce a new policy concept. The principle of wind energy development is already established in Policy DM 45 and the clarification of the policy is a factual correction to distinguish between repowering and decommissioning. In addition, the amended text includes reference to the Habitats Regulations. This is in recognition that repowering/decommission may take place after the lifetime of the plan and is a statement of fact. Suggested minor change at para 12.28, page 275 Deletion of the word "repowering". Insert new sentence at end of para 12.28 "Where proposals come forward for the re-use, refurbishment, repair or repowering of existing renewable energy development in order to prolong their life span these will be considered on their individual merits in light of the then prevailing policy. The provisions of The Conservation (Natural Habitats, etc.) Regulations (NI) 1995 as amended will also apply to all such proposals".
LA03/DPS/0103	RSPB NI	DM 45	RSPB NI considers that Policy DM 45.2 (e), which cites the test as 'significant effect', does not comply with SPPS 6.224, which states 'not result in an unacceptable adverse impact'.	Recommended that criterion (e) be amended as follows, 'e'. The proposal avoids or adequately resolves any unacceptable adverse impact including on...'	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy". The Council considers that Policy DM 45 addresses the issue raised in the representation when read in its entirety, having regard to the reference to "any unacceptable adverse impact" in Policy DM 45.2.
LA03/DPS/0103	RSPB NI	DM 45	RSPB NI welcomes the Spatial Framework for wind energy and considers a map depicting the geographical extent of each group in the Spatial Framework for wind energy would have been most helpful in the understanding of its application.	A map should be provided in any future iteration of the Plan Strategy.	Support noted and welcomed. The Council considers that the request for a map depicting the Spatial Framework for Wind Energy is a matter inclusion at the Local Policies Plan stage of the process.
LA03/DPS/0103	RSPB NI	DM 45	RSPB NI considers 'Group 2' in Policy DM 45.5 as currently worded, represents a significant weakening of existing policy. The proposed threshold not only serves to undermine and weaken such tests, but also to create unnecessary confusion and uncertainty.	As a minimum, internationally designated sites must be transferred to Group 1. If left outside of Group 1, these areas could become sink holes for development.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy". The Council considers the Spatial Framework for Wind Energy Development as drafted is appropriate and reasonable. International Sites of Nature Conservation Importance are included in Areas of Protection and whilst as a consequence wind turbine proposals are not ruled out all such proposals would nevertheless be required to meet with the provisions of Policy DM 37 including the undertaking of an appropriate assessment where relevant.
LA03/DPS/0103	RSPB NI	SP 10	RSPB NI considers that the policy fails to recognise the adoption of the 'precautionary' or 'polluter pays' principle. Such a principle means that polluters should pay the full costs of any measures required to protect the environment as a result of their actions.	Application of the precautionary and polluter pays principles should be added to Policies SP 10.7 and DM 53.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy". The application of the precautionary principle is set out in Policy SP 1.3 and proposals will be considered under this policy in addition to Policies SP 10 and DM 53. All policies within the LDP should be read together. This is made clear in Policy SP 1 and Positive Planning Note on page 11 and paragraph 1.5. The Council considers the matter of the polluter pays principle is outwith the LDP process. The Council would advise that this normally relates to the prosecution of pollution incidences and responsibility lies with DAERA under the Environmental Liability Regulations 2009.

LA03/DPS/0103	RSPB NI	Monitoring	RSPB NI considers that IMF measures are deemed as not 'SMART' due to absence of triggers for remedial action or measurement.	IMF - each indicator to have a target and/or trigger (as a basis for measurement). Additional indicator required to measure natural heritage aspects.	No change required. Para 14.10 states that our monitoring report is indicative and one which will continue to develop as the LDP progresses.
LA03/DPS/0104	Mr Gawn Graham, (Jobling Planning & Environment)	Plan Vision	Mr. Graham welcomes the Plan Vision and agrees that the LDP should result in the Borough being an 'excellent, attractive and diverse place in which to live and work' and agrees that 'development should be sustainable'.	No specified modification.	Support noted and welcomed.
LA03/DPS/0104	Mr Gawn Graham, (Jobling Planning & Environment)	Strategic Objectives	Mr. Graham is particularly supportive of Strategic Objectives 1, 7 and 8.	No specified modification.	Support noted and welcomed.
LA03/DPS/0104	Gawn Graham (Jobling Planning & Environment Ltd)	SP 1	Mr. Graham considers that the DPS Spatial Growth Strategy appears to be soundly based but identifies concerns about the proportion of housing allocated to the countryside and the impact this has on the village allocation. Draws attention to paragraph 4.7 as it does not mention villages and appears to favour countryside provision over focused growth in villages to service the countryside.	No specified modification.	No change required. The Council considers that the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council points out that the role of villages is identified under Strategic Growth Strategy Policy SP 1.6(d) and that paragraph 4.7 references smaller settlements, which includes those within the village category.
LA03/DPS/0104	Mr Gawn Graham, (Jobling Planning & Environment)	SP 4	Mr. Graham considers that the proposed housing allocation over allocates to the countryside at the expense of existing villages. Considers the allocation of almost 8% growth across the countryside, compared to less than 1% in each village is disproportionate and fails to properly take account of the role of villages as being service centres for the rural population. This allocation will create tensions in delivering 'sustainable development' and will weaken the role of villages in the rural area. Furthermore this allocation will compromise the delivery of the Spatial Growth Strategy and does not take account of the RDS. Considers that the specific allocation to Burnside should be increase to reflect its role.	The housing allocation to villages and especially Burnside should be increased.	No change required. It is considered that the housing allocation is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of settlements. It is considered that an increase in the overall housing allocation to villages and especially Burnside would be at odds with the considerations identified above. The Council considers that rather than being an allocation to the countryside, the 750 units estimation for the plan period occurs as a function of the regional rural policy direction contained within the SPPS and reflected within the rural housing policies contained within the draft Plan Strategy. The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0104	Mr Gawn Graham, (Jobling Planning & Environment)	Site Specific	Mr. Graham requests that subject land be considered for housing development: Burnside.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0104	Mr Gawn Graham, (Jobling Planning & Environment)	Site Specific	Mr Graham identifies that whilst it is acknowledged that 2 previous zoned housing sites in Burnside remain undeveloped and were not brought forward for development over the last plan period, there is no assurance that these will be released for development by 2030. Suggests it is critical that settlement limits provide sufficient land for development and not land banked.	No specified modification.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated with Topic Paper 1 Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.

LA03/DPS/0105	Conway Group	SP 2	The Conway Group consider that it is evident that the key aim of the DPS is to strengthen the role of Metropolitan Newtownabbey and is supportive of this. Considers that suitable sites must be allocated to promote future sustainable economic growth.	No specified modification.	Support noted and welcomed.
LA03/DPS/0105	Conway Group	SP 4	The Conway Group notes that the proposed housing growth figure of 9,750 units in the DPS is considerably lower than that proposed in the POP preferred option. Considers that this growth rate will not meet the housing needs of the Borough. Also considers that additional housing growth is required to help meet the ambitious economic growth plans of neighbouring Belfast City Council. Considers that such an approach is necessary to meet statutory requirements of the Planning Act 2011 and is also consistent with the RDS and SPPS. Considers that additional housing growth is clearly necessary, along with additional allocations to commuter settlements which serve Belfast.	The housing growth figure for the Borough should be increased.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. Whilst reliance for an uplift in the Borough's housing growth figure in this representation is made on the need for the Plan to accommodate the economic growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.
LA03/DPS/0105	Conway Group	SP 4	The Conway Group consider that the reduction in housing allocation for Metropolitan Newtownabbey from 4,400 units as proposed in the POP preferred option, to the 3,900 units proposed in the DPS will result in a significant shortfall of dwellings. Considers an increase in the housing allocation is necessary due to the ambitious economic growth plans of neighbouring Belfast.	Housing allocation should be amended to increase the proportion of new housing to Metropolitan Newtownabbey.	No change required. It is considered that the 3900 unit housing allocation proposed for Metropolitan Newtownabbey is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Metropolitan Newtownabbey. It is considered that an increase in the overall housing allocation to Metropolitan Newtownabbey would be at odds with the considerations identified above. The DPS's evidence base for the housing allocation to Metropolitan Newtownabbey is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0105	Conway Group	Site Specific	The Conway Group requests subject lands be considered for housing development: Metropolitan Newtownabbey.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0106	NI Electricity Networks (RPS Group)	DM 14	NI Electricity Networks welcomes and supports the Council's aim for public utilities and infrastructure to achieve a sustainable balance between the prosperity and protection of our environment.	No specified modification.	Support noted and welcomed.
LA03/DPS/0106	NI Electricity Networks (RPS Group)	DM 14	NI Electricity Networks considers Policy DM 14.2 as unsound.	Suggested policy rewording: "The Council will require the submission of sufficient information to enable consideration of these matters and ensure that any unacceptable adverse impacts are adequately mitigated".	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council points out that all policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5. Policy SP 1 clearly refers to the need for developers to submit impact assessments to ensure proposals can be fully considered by the Council.
LA03/DPS/0106	NI Electricity Networks (RPS Group)	DM 14	NI Electricity Networks considers Policy DM 14.3 (a) as unsound. Considers the Policy is unclear and does not provide a clear definition of an Area of Landscape Importance. Considers Evidence Paper 16: Landscape Character Assessment does not sufficiently define an Area of Landscape Importance. Considers the Policy is overly restrictive and places limitations on the ability to achieve other government targets, and also limits NI Electricity Network's ability to meet RG5 of the Regional Development Strategy 2030 (To deliver a sustainable and secure energy supply).	Suggested policy rewording: "Proposals for overhead electricity lines will be acceptable where it has been demonstrated all of the following criteria are met: (a) They have no unacceptable impact on strategic landscape policy areas". Suggested footnote to the added - "Areas of landscape importance to be defined by the Council". NI Electricity Networks considers policy amendment better reflects the objectives of the RDS and are consistent with relevant planning policy and legislative obligations (in respect of the protection of the natural and built environment).	Open to minor change. The Council is suggesting the following minor change in response to the representation to clarify that the policy relates to those landscape areas that are identified in Policy SP 8, which was always the case. The DPS makes clear that all policies within the LDP should be read together. This is made clear in Policy SP 1, the Positive Planning Note on page 11 and again at para 1.5. Suggested minor change at Policy DM 14.3(a), page 126 "....landscape importance as set out in SP 8".

LA03/DPS/0106	NI Electricity Networks (RPS Group)	DM 42	<p>NI Electricity Networks have expressed concerns regarding Policy DM 42.3 as they believe it is unrealistic and an impractical requirement in the context of NIE Networks' legal obligations and current working practices.</p> <p>Notes that the replacement of trees and hedgerows is often restricted by overhead cables and underground lines.</p>	<p>NIE Networks suggest the following policy wording amendment "If it is demonstrated to the satisfaction of the Council, that it is not possible to retain existing trees/or hedgerows then an appropriate replacement planting scheme may, where appropriate, be required. Any such replacement planting scheme should normally be located within the site and introduce a net gain in tree numbers."</p>	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that there is no material difference between the wording of Policy DM 42.3 and the revised wording suggested by the respondent. This is by virtue of Policy DM 42.3 stating that a replacement planting scheme will be required, 'where appropriate'. This acknowledges that there may be occasions where replanting in situ may not be appropriate, such as the example provided. Ultimately this is a matter for consideration through the normal Development Management process.</p>
LA03/DPS/0106	NI Electricity Networks (RPS Group)	DM 45	<p>NIE highlight a minor inaccuracy in Amplification text (Para 12.29), where reference is made to "National Grid", it should be replaced with "electricity network".</p>	<p>Reference to "National Grid" in Para 12.29 should be replaced with "electricity network".</p>	<p>Noted. A list of typographical errors is set out in the Council's published Draft Plan Strategy Public Consultation Report.</p>
LA03/DPS/0107	DfI (Roads)	How to Use this Document	<p>DfI (Roads) consider it is clear from the wording in the Positive Planning Note (page 11, DPS) that there should be read across with the Strategic Policy and the Detailed Policy within a particular policy area.</p> <p>However it is not conveyed that there should be policy read across all different policy areas. It should be made clear that the likes of Roads Policy will apply across ALL other policy areas.</p>	<p>No specified modification.</p>	<p>No change required. The Council considers that the Positive Planning Note as drafted is appropriate and reasonable.</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.</p>
LA03/DPS/0107	DfI (Strategic Planning)	Setting the Context	<p>DfI (Strategic Planning) welcomes the Council's acknowledgement of infrastructure capacity constraints (especially for WWTW) in the Borough. Highlights a key test for soundness is consideration of cross boundary issues and is encouraged by the Council's commitment to working with its partners to improve accessibility and connectivity and its key aim to integrate transportation and land use in ways which enable people to carry out their everyday activities with less need to travel with maximum modal choice.</p>	<p>No specified modification.</p>	<p>Support noted and welcomed.</p>
LA03/DPS/0107	DfI (TPMU)	Setting the Context	<p>DfI (TPMU) indicate that there is no reference in para. 2.77-2.82 to the heavy commuting flow to Belfast and the capacity of the transport networks, nor reference to Belfast City Council proposals to add substantial employment which is likely to generate additional commuting flows, including from Antrim and Newtownabbey.</p> <p>Furthermore the settlement strategy (and housing allocations SP 4.3 Table 6) favour Metropolitan Newtownabbey, Antrim and Ballyclare yet each of these is likely to add to an already congested network as Belfast City employment is proposed to grow. There is no clear statement as to how it is intended to deal with this.</p>	<p>No specified modification.</p>	<p>The Plan and all its evidence base should be read together. The DPS recognises the strategic context in which it was prepared including its neighbouring councils and seeks to deliver sustainable growth. It actively seeks to promote integration of transport and land use, and policies that reduce reliance on the private car.</p> <p>The Council is represented on the cross boundary Metropolitan Area Spatial Working Group as well as the Belfast Metropolitan Transport Plan Project Board.</p> <p>The Council considers that the Belfast Metropolitan Transport Plan has a significant role to play in dealing with such issues. The Council has proactively engaged with DfI in its emerging transport study which was published in December 2020. The Council will continue to liaise with DfI and neighbouring councils as all plans progress. It will also continue to liaise with regard to the Glider and greater Belfast transport initiatives.</p> <p>The Council states in paras 4.6- 4.7 that the growth strategy is based on focusing core growth in those settlements where infrastructure is already in place and that it takes account of inherited growth. This takes account of the RDS, as referenced in para 4.4 of the DPS. The plan also has a range of policies that seek to integrate transport and land use planning and encourage sustainable transport choices. It is clear when the plan is read in totality that the Council seeks to deliver sustainable growth and encourage sustainable transport choices.</p> <p>Whilst it is acknowledged that people living within the Borough may travel to Belfast to for work purposes, it is equally the case that the DPS seeks to promote job opportunities within the Borough. A core component of the DPS is to reduce the level of travel by ensuring adequate employment opportunities close to people's places of residence.</p>
LA03/DPS/0107	DfI (Water & Drainage Policy Division)	Setting the Context	<p>DfI (Water and Drainage Policy Division) considers the Council should request further updated information in respect of all waste water treatment works from NI Water and also confirm to NI Water the assumptions made in the DPS in respect of Antrim and Ballyclare wastewater treatment works.</p>	<p>No specified modification.</p>	<p>The Council have fully engaged with our statutory partner, NI Water throughout the preparation of the Local Development Plan, on issues pertaining to WWTW capacity within the Borough. The Council will continue to engage with NI Water throughout the DPS and LPP stage process.</p>

LA03/DPS/0107	DfI (Strategic Planning)	SP 1	<p>DfI (Strategic Planning) welcomes criteria within the Spatial Growth Strategy which identify core growth in Antrim and Newtownabbey based upon existing committed development allocations (and the % allocated to these areas) and the aim of consolidating and strengthening Ballyclare. The aim of consolidating the role of Randalstown and Crumlin as local service centres and sustaining and maintaining the role of villages as service centres are also welcomed. Furthermore the commitment to sustaining and maintaining the rural area through the provision of suitable housing and employment opportunities in hamlets and the countryside is also welcomed.</p> <p>Consider that criteria (g), 'suitable protection to natural and historic environment in accommodating growth' is less spatial and should be reworded. Also the focus in criteria (g) to promote the provision of facilities, services and infrastructure etc. is understood, but should be refocused.</p>	<p>Criterion (g) "suitable protection to natural and historic environment in accommodating growth" might be more appropriately expressed as promotion of development patterns that do not have an adverse impact on environmental resources and built heritage , for instance compact urban forms and more housing within existing urban areas.</p> <p>The wording of Policy SP 1.11 may be more appropriate for inclusion. Also the focus in criterion (g) to "promote the provision of facilities etc." should emphasise the need to locate development to make best use of existing infrastructure and promote sustainable access to existing services.</p>	<p>Support and noted and welcomed for criteria (a) to (f).</p> <p>The Council considers that the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach."</p> <p>The Council is content that the issues raised are already adequately addressed in the Plan and do not need to be added to the Spatial Growth Strategy.</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 1	<p>DfI (Strategic Planning) welcomes the Plan's proposed hierarchy of places 'The Places of our Borough' (table 1, page 66) across seven tiers, including the countryside.</p> <p>The Council may wish to clarify the approach in Evidence Paper 2: Settlement Evaluation which identifies six tiers and excludes the countryside.</p>	No specified modification.	<p>Support noted and welcomed.</p> <p>The focus of Evidence Paper 2: Settlement Evaluation is on the existing and proposed settlements across the Borough. This involves an assessment of their role and function, with a view to identifying a settlement hierarchy for the Borough, which is comprised of 6 individual tiers. When combined with the consideration of the countryside, a seven tier 'Places of our Borough' is identified, as set out on page 66 of the DPS.</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 1	<p>DfI (Strategic Planning) considers that in the context of the significant additional potential supply indicated in Table 12 of Evidence Paper 6: Housing (1,466 units), the wording "proposals on sites not allocated or otherwise identified for development but within settlement limits will be supported in principle where they accord with the relevant policies of the LDP and are of a scale and nature appropriate to their settlement classification and location", supports the approach of the SPPS.</p> <p>The SPPS approach relates to, sustainable patterns of residential development, including the encouragement of compact urban forms and reduced use of greenfield land.</p>	No specified modification.	Support noted and welcomed.
LA03/DPS/0107	DfI (Strategic Planning)	SP 1	DfI (Strategic Planning) notes and welcomes the statement in Policy SP 1.10, however the Council may wish to give consideration to clarifying the circumstances when overriding reasons would justify approval for example, within relevant Detailed Management Policies or Amplification text.	No specified modification.	<p>Support noted and welcomed.</p> <p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council considers overriding reasons will be a matter for consideration during the normal Development Management process which will consider the policies contained within the LDP and other material considerations.</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 1	DfI (Strategic Planning) welcome the support for proposals that re-use or make better use of vacant, derelict or under-used brownfield land or buildings etc. Whilst DfI assumes that this will also encompass the countryside, it considers that the overall thrust of the SPPS is to encourage such redevelopment within settlements.	No specified modification.	<p>Support noted and welcomed.</p> <p>As Policy SP 1.11 clearly states, "In all locations". The Council considers the policy wording is clear and unambiguous, whilst it should also be noted, that such proposals will only be considered appropriate where they accord with relevant policies contained within the LDP.</p>
LA03/DPS/0107	Department for Infrastructure (TPMU)	SP 1	DfI (TPMU) considers that the existing zonings and extant permission appear to make up the majority of allocations in the Spatial Growth Strategy but it is not clear how many of these could be considered sustainable when they are likely inaccessible other than by private car.	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have this approach".</p> <p>Many of these sites have been identified as zonings in legacy area plans for the Borough and have therefore been deemed as appropriate locations for development. Others have come through proposals considered within the normal Development Management process, which would include consultation with Roads Service and again are regarded as acceptable. Where new sites are brought forward through the Local Policies Plan stage of the process, it is anticipated that the Council will assess these in terms of accessibility, as well as other considerations .</p>

LA03/DPS/0107	DfI (Strategic Planning)	SP 1	DfI (Strategic Planning) considers the use of the wording 'in appropriate cases' appears to imply that in some instances the Council will not seek a contribution from a developer even where a development impacts on the provision of the Borough's services and environment.	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>Policy SP 1.17 clearly states, "The Council intends to bring forward supplementary planning guidance to explain in greater detail how developer contributions will be implemented through the planning process and the scale of the contributions likely to be required".</p> <p>It is acknowledged that some minor impacts may not in some circumstances require a developer contribution.</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 1	DfI (Strategic Planning) welcomes the Plan indication that the Council will seek a financial guarantee or bond, however suggests the Council should consider how this will apply in practice.	No specified modification.	<p>Support noted and welcomed.</p> <p>Policy SP 1.17 states, "The Council intends to bring forward supplementary planning guidance to explain in greater detail how developer contributions will be implemented through the planning process and the scale of contributions likely to be required".</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 2	DfI (Strategic Planning) considers the Council should continue to engage with infrastructure providers to ensure that the policy approach to Nutts Corner SEL can be supported by the necessary infrastructure at rural locations.	No specified modification.	Noted. The Council will bring forward, key site requirements in consultation with key stakeholders at the LPP stage of the Plan to ensure that any rural infrastructure needs are met.
LA03/DPS/0107	DfI (Strategic Planning)	SP 2	<p>DfI (Strategic Planning) notes that the Council will operate a 'town centre first' approach in considering the development of retail and other main town centre uses across the Borough by applying the draft Retail Hierarchy as set out in Table 4, page 79 of the DPS.</p> <p>Considers that in the absence of further detail in the policy amplification on the desired role/function of centres within each tier of the Retail Hierarchy, it is difficult to see how this policy will be applied in practice.</p>	No specified modification.	<p>Open to minor change.</p> <p>The Council considers the proposed Retail Hierarchy as set out in Table 4, page 79 of the DPS is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council considers that the assessment of proposals for retail development and main town centre uses across the Borough is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS (in particular Policies DM 6 and DM 7), relevant guidance and other material considerations. In addition, all policies within the Plan should be read together. This is made clear in Policy SP1, Positive Planning Note on page 11 and para 1.5.</p> <p>Nevertheless, the Council acknowledges that, in response to the representation, the inclusion of an additional column in Table 4 of the DPS based on the information already set out in the published retail study would be beneficial at this stage.</p> <p>The reason for the following suggested minor change is for the purposes of clarification in relation to the role and function of a centre at a strategic policy level. The wording does not introduce a new policy concept as it is clear when the DPS and its evidence base are read together what the intention of the policy is in relation to the role and function of the centres of the Borough as identified in Table 4, and in particular the position as outlined in Policy SP 2.12 (c) which seeks to ensure that appropriate new development within the retail hierarchy is of a scale and type commensurate with the centre's size and function.</p> <p>The amendment of Table 4 in the DPS to provide wording relating to the role and function of the centres within the retail hierarchy is based upon the Figure 6.2 on page 104 of Evidence Paper 4 Retail and Commercial Leisure Study which was subject to public consultation and its suggested inclusion is for clarification purposes of the role and function of centres.</p> <p>Suggested minor change SP 2 Table 4, page 79. Introduce an additional column in Table 4 incorporating text from the published retail study as set out in Evidence Paper 4: Retail and Commercial Leisure. The suggested revised table is set out in Annex A of this report.</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 2	<p>DfI (Strategic Planning) notes that Abbey Centre is identified as a Large Town Centre in the top tier of the Council's proposed Retail Hierarchy of the DPS (Table 4, page 79). Considers that whilst it has a large retail offer and a doctors surgery, it does not comprise the typical range of uses found in town centre as set out in the RDS Diagram 2.2 and para. 2.71, footnote 58 of the SPPS.</p> <p>The Department notes that Metropolitan Newtownabbey does not otherwise have a town centre and therefore to apply the sequential test development may be directed to Belfast or Antrim town. The Council should therefore give consideration to the potential unintended consequences this designation may have on other town centres within the Borough including Antrim which is classified as a Main Hub and beyond to Belfast City Centre which is referred to as the 'Primary Retail location' in Northern Ireland in the RDS.</p> <p>Notes that Whiteabbey Village is proposed as a tier 3 District Centre in the Retail Hierarchy and considers this appears to be based on a qualitative assessment relating primarily to the number of retail units. Despite having more units than the other centres outlined in tier 4 of the Retail Hierarchy, the Department would welcome further quantitative evidence/analysis in support of this designation.</p>	No specified modification.	<p>No change required. The Council considers that the Policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council's rationale for the hierarchy of retail centres proposed within the Borough is set out in Evidence Paper 4: Retail and Commercial Leisure Study. Whilst this acknowledges that the Abbey Centre is not a Town Centre in the traditional sense, it nevertheless supports its designation as a tier 1 centre as there are sound planning and sustainability reasons to do so, not least the role currently played by the Centre as the physical heart of Metropolitan Newtownabbey. It further highlights that such a designation will assist in diversifying its future role and function and suggests preparation of a Masterplan to assist this approach, a matter the Council would intend taking forward at the LPP stage.</p> <p>The evidence paper also provides the rationale for the proposed designation of Whiteabbey Village as a District Centre highlighting that it is clearly distinguishable from the lower order Local Centres proposed.</p>

LA03/DPS/0107	DfI (Strategic Planning)	DM 1	DfI (Strategic Planning) suggest the Council should consider whether the proposed wording of Policy DM 1 is precise enough to secure the appropriate control over development at Nutts Corner, in order to direct economic development to Antrim as appropriate.	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>Policy DM 1 clearly limits the uses deemed acceptable at Nutts Corner SEL , whilst Policy SP 2.12 states, "The Council will operate a town centre first approach in considering the development of retail and other main town centre uses across our Borough".</p> <p>All policies within the LDP should be read together. This is made clear in SP 1, Positive Planning Note on page 11 and para 1.5.</p> <p>Further information on the rationale for the identification of Nutts Corner as an existing SEL is set out in Evidence Paper 3: Economic Growth.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 1	DfI (Strategic Planning) considers the wording within Policy DM 1, 'would not create problems for the remaining businesses at the site' could be open to interpretation.	No specified modification.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation for the purposes of clarification to highlight that the Council's approach to local employment sites includes that alternative uses should not have a detrimental impact on remaining businesses. This wording does not introduce any new policy concept to the DPS and simply seeks to clarify the meaning of the original text "would not create problems" in Policy DM 1.4.</p> <p>Suggested minor change at DM 1.4(c), page 89. "(c) The alternative use proposed would not result in conflict or be incompatible with the remaining businesses at the site or be materially detrimental to the specific character and amenity of the immediate area."</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 1	DfI (Strategic Planning) considers it would be beneficial if it was clear what is required to demonstrate a proposal being 'firm'.	Confirm what is required to demonstrate what makes a proposal 'firm'.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council notes that the word 'firm' has been used in previous planning publications issued by the Department. For example, PPS 4 Policy IBD 12.</p> <p>The Council considers the choice of the word 'firm' as clear and unambiguous.</p>
LA03/DPS/0107	DfI (TPMU)	DM 1	DfI (TPMU) considers that whilst Policy DM 1.1 confirms that the acceptable uses would be limited, there is no explanation as to why, i.e. lack of public transport.	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provision of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>Permitted uses in rural Strategic Employment Locations are limited as the primary focus for employment land is directed to settlements. The Council has already indicated that the policies within the plan are to be read as a whole.</p> <p>The DPS's evidence base for Strategic Employment Locations is set out in Evidence Paper 3: Economic Growth. This document should be read for further information.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 1	DfI (Strategic Planning) consider that Policy DM 1.6 offers no suggestion how business/employment related uses will be dealt with sequentially in line with paragraph 6.85 of the SPPS.	No specified modification.	<p>No change required. The Council considers the policy as drafted as appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The Council would firstly advise that there is no sequential test set out in Para 6.85 of the SPPS. Overall it considers the approach advocated in DM 1.6 broadly follows (and indeed could be viewed as slightly more restrictive than) the approach set out in Para 6.85 which indicates proposals for business use beyond the centres identified in a Plan should be determined on their individual merits, taking account of potential impacts and benefits arising.</p>
LA03/DPS/0107	DfI (Roads)	DM 1	DfI (Roads) considers Policy DM 1.5 should also refer to transportation and infrastructure or add text, "...and accord with other relevant policies within the LDP".	Suggests a not specified modification to refer to transportation and infrastructure, or the addition of text to Policy DM 1.5, '.....and accord with other relevant policies within the LDP.'	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 2	DfI (Strategic Planning) consider that in relation to Policy DM 2.7(b) policy wording 'proposal will make a significant contribution to the local economy', it may be useful to clarify what type of contribution is expected.	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Plan clearly states in Para. 5.31, "The Council is therefore committed to facilitating opportunities for appropriate economic development and diversification in the countryside in a manner which safeguards the quality of our Borough's rural environment for local people and visitors alike. Healthy economic activity in rural areas facilitates investment to sustain and enhance the countryside's appeal and to meet the needs of the rural community".</p> <p>The Council do not consider there is any ambiguity as to what the Plan constitutes a 'contribution'.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 2	DfI (Strategic Planning) considers that in relation to Policy DM 2.9, policy wording 'proposal will make a significant contribution to the regional economy'; it may be useful to clarify what type of contribution is expected.	Indicate what is required to meet this element of the policy test.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The Plan clearly states in Para 5.31, "The Council is therefore committed to facilitating opportunities for appropriate economic development and diversification in the countryside in a manner that safeguards the quality of our Borough's rural environment for local people and visitors alike. Healthy economic activity in rural areas facilitates investment to sustain and enhance the countryside's appeal and to meet the needs of the rural community".</p> <p>The Council do not consider there is any ambiguity in the Plan's policy wording.</p>
LA03/DPS/0107	DfI (Roads)	DM 3	<p>DfI (Roads) query Policy DM 3.2 and reference to supplementary planning guidance contained within PPS 4. Advise that it should be clarified with DfI Strategic Planning whether the existing planning policies/guidance referenced will still be available when PPSs are collapsed and removed.</p> <p>Council may wish to consider hosting the referenced policies/supplementary guidance on their website for ease of reference.</p>	No specified modification.	<p>No change required. By including references to existing documents within the Policies of the DPS, the Council considers that it is clear that these will continue to apply following the adoption of the DPS and until such times as the Council brings forward Supplementary Planning Guidance in relation to these matters.</p>

LA03/DPS/0107	DfI (Strategic Planning)	DM 3	DfI (Strategic Planning) considers it would be clearer if the content of SPPS para. 1.14 (relating to SPG to PED 8 will continue to be treated as material considerations during the transition period) was repeated in the DPD or attached in the form of Strategic Planning Guidance.	No specified modification.	No change required. The Council considers the policy as draft is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. Paragraph 1.5 'Development Impact Assessments' of the DPS clearly states, "For all assessments, the Council will take into account published Best Practice Guidance documents". Furthermore, the Council will bring forward, if required, specific supplementary guidance in due course.
LA03/DPS/0107	DfI (Strategic Planning)	DM 4	DfI (Strategic Planning) notes that there appears to be no reference within the DPS to forestry development as per the SPPS. It is noted that forestry development is however specifically mentioned in Policy DM 40.	The Council should ensure there is consistency throughout the DPS policies.	No change required. The Council recognises that there is no specific policy in the DPS for forestry development, however it should be noted that the Council's records indicate there has only been one planning application lodged for such development in the last 10 years. The Council is nevertheless content that the policy provisions of SP 1.2 would apply should such a proposal arise in the future. As such a forestry proposal would be determined on its individual merits through the normal development management process considered against relevant material considerations and taking account of the provisions of the SPPS.
LA03/DPS/0107	DfI (Strategic Planning)	DM 6	DfI (Strategic Planning) considers that Policy DM 6 applies to development proposals in all centres irrespective of position in the Retail Hierarchy. Considers that as no distinction is made between town, district and local centres, it is considered that Policy DM 6 has not fully taken account of para. 6.277 of the SPPS which requires Councils to set out appropriate policies that make clear which uses will be permitted in the hierarchy of centres and other locations and the factors that will be taken into account in decision making. Considers that there is an omission in relation to district and local centres in that Policy DM 6 does not meet the provisions of SPPS para. 6.283, which requires all applications for retail or town centre type developments which are not proposed in a town centre and are not in accordance with the LDP to undertake a full assessment of retail impact as well as need. Considers that it is unclear how Policy DM 6.1 and its criteria is to be assessed in practice. Clarification required on whether Policy DM 6.4 would imply that residential would be encouraged on the upper floors of the Abbey Centre. It is unclear if the small shops policy is the policy for considering development in Local Centres. 1 of 2	No specified modification	Open to minor change. Overall the Council considers the broad thrust of Policy DM 6 as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Nevertheless, the Council is suggesting the following minor textual changes in response to the representation for the purposes of clarification. Suggested minor change Policy DM 6, page 98: Policy DM 6: "The Council will encourage and support a diverse range of retail and complementary town centre uses within our Borough's identified centres...to meet local needs. All development proposals should contribute positively to the vitality and viability of the centre, and will be required to demonstrate that they will maintain or enhance the visual amenity of the area by providing an active and attractive frontage appropriate to the location." together with the insertion of a footnote for complementary uses: "Complementary town centre uses include cultural and community facilities, leisure, entertainment and business uses, including offices." These suggested changes do not introduce a new policy concept. It was always the intention of the policy to recognise and promote the positive role of our Borough's centres as the most appropriate locations for retail development and other main town centre uses. The preceding paragraphs 5.39 and 5.40 make it clear that Policy DM 6 applies to the Borough's town, district and local centres i.e. the identified centres as set out in Table 4 of Policy SP2. Furthermore, it is clear when all the policies within the LDP are read together (as indicated in Policy SP 1, Positive Planning Note on page 11 and Para. 1.5) that the reference to complementary use in Policy DM 6 is self-explanatory. The concept of complementary town centre uses is also stated in the SPPS and defined in footnote 58. As indicated in SP 1 the SPPS is a material consideration to be read alongside the DPS. The provisions of the policy as originally drafted are not considered unduly onerous and their application through the normal Development Management process is intended to help ensure that all proposals, including retail schemes, will promote the positive role and help sustain the vitality and viability of the Borough's centres. Nevertheless, the Council notes the concern raised in this and other representations regarding its application in relation to retail proposals in a town centre and has suggested the above minor textual changes to make the policy intent clear. 1 of 3
LA03/DPS/0107	DfI (Strategic Planning)	DM 6	2 of 2 The SPPS states that Planning Authorities should retain and consolidate existing district and local centres as a focus for local everyday shopping. Paragraph 5.42 states the aim of the policy is to protect the role, viability and vitality of existing town centres. The Department would welcome clarification as to the implementation of this policy in relation to new town centres proposed in the hierarchy.	see above	2 of 3 This involves dropping 6.1 (c) and recasting the remaining text. The suggested text simply clarifies the policy intent and does not introduce a new policy concept as the original text in DM 6.1 (a) and (b) covered these points. Furthermore, the Council is content that the deletion of 6.1 (c) does not diminish the policy intent. It is clear when the DPS and its evidence base are read together that the DPS seeks to recognise and promote the Borough's town, district and local centres as the most appropriate location for retail development and other employment, leisure and cultural uses and this remains the case with the minor changes suggested. Tiers of the Retail Hierarchy: The Council does not consider that there is a need for a separate policy for each tier of the Retail Hierarchy, rather it is considered the suggested minor change proposed to Table 4 in SP2 to incorporate text based on the published retail study for each of element of the retail hierarchy in the Borough adequately addresses this matter. Retail Assessment: The Council is also suggesting the following minor change for the purposes of clarification in relation to the information that is required to accompany larger scale retail proposals in a District or Local Centre. "District and Local Centres DM 6.5 A Retail Assessment will be required for any development proposal that involves an increase of more than 1,000 m2 (gross) of retail floor space in District and Local Centres. The Retail Assessment should provide a proportionate response to the proposal being sought and incorporate an assessment of need, impact and the sequential test. This includes applications for an extension/s which would result in the overall development exceeding 1000 square metre gross external area." The suggested change does not amend the policy for control of retail development nor introduce a new policy concept. It is clear when the DPS and its evidence base are read together that the DPS seeks to recognise and promote the Borough's town, district and local centres as the most appropriate location for retail development and other employment, leisure and cultural uses where these are of a scale and type commensurate with the centre's size and function (see also SP 2.12). The introduction of this text does not introduce a new policy concept as Policies SP 1 and DM 7.5 already establish the principle of requiring a retail assessment for relevant schemes. Whilst the need for such an assessment in District and Local Centres is not currently highlighted it is a matter that would in any case be raised through the normal development management process taking account of Policy SP 1 and the provisions of the SPPS (paragraph 6.283) which is a material consideration to be read alongside the DPS. As such the suggested change complements the existing policy of the DPS and the SPPS and is beneficial in alerting prospective developers to the need for such an assessment to accompany relevant schemes in one of the Borough's District or Local Centres. In essence the suggested change is simply seeking to clarify the need for such an assessment and assist in front loading the application process.

LA03/DPS/0107	DfI (Strategic Planning)	DM 6	see above	see above	3 of 3 Abbey Centre: The Council considers that the assessment of any proposals for residential development on upper floors at Abbey Centre (if its status as a Large Town Centre is confirmed through the IE) would be a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and material considerations.
LA03/DPS/0107	DfI (Strategic Planning)	DM 7	DfI (Strategic Planning) note that under the provisions of Policy DM 7.1, the Council will apply a sequential test for development proposals for retail or other main town centre uses in the following order: Town Centre; Edge of Town Centre sites, and Out of Centre locations that are, or can be made accessible by walking, cycling and public transport. Considers that this is not reflective of the Policy SP 2.12 which sets out the hierarchy of retail centres and includes district and local centres in tiers 3 and 4.	No specified modification.	No change required. The Council considers that Policy DM 7.1 as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Para. 5.42 of the DPS clearly states, "The aim of this policy is to protect the role, viability and vitality of existing town centres from the adverse impacts that can arise from competing development proposals for retail and other town centre uses in other locations. A sequential test must therefore be undertaken for relevant proposals on sites located outside our Borough's centres..." The Council considers that DfI is mistakenly seeking to adopt a retail hierarchical approach to the sequential test. The approach set out in Policy DM 7.1 which considers Town Centres first, then Edge of Town Centres sites, and then Out of Centre sites mirrors that set out in para 6.281 of the SPPS. This sequential test will apply to all development proposals for retail use (including extensions) and other main town centre uses outside of Borough's identified centres.
LA03/DPS/0107	DfI (Strategic Planning)	DM 7	DfI (Strategic Planning) consider that in relation to Policy DM 7.2 that the term 'commercial centre' is not defined and is open to interpretation. Greater detail in relation to what are considered to be quantitative and qualitative deficiencies would provide additional clarity.	No specified modification.	Open to minor change. The Council is suggesting the following minor change in response to the representation to clarify what is meant by a commercial centre for the purpose of the policy. This clarifies that the terminology was intended to relate to centres identified in the DPS. This is simply a rephrasing of the current wording to clarify the meaning of the policy. Suggested minor change at Policy DM 7.2(a), page 100 Amend 'commercial centre' to "identified centre".
LA03/DPS/0107	DfI (Strategic Planning)	DM 7	DfI (Strategic Planning) considers that Policy DM 7.5 could be seen as permissive and does not fully take account of the SPPS. Considers the Plan does not include reference to retail assessment being required for extensions which would result in the overall development exceeding 1,000 sq. m. gross external, as outlined in para. 6.283 of the SPPS. Notes that Policy DM 7.6 states that applications to vary or delete restrictive conditions applying to existing out of centre premises, such as sale of bulky goods will be assessed under this policy. Considers it is unclear as to whether this policy is applicable to all proposals involving an increase of more than 1,000 sq. m. , as it is noted that many restrictive conditions relate to retail warehouses that fall short of the 1,000 sq. m. threshold.	No specified modification.	Open to minor change. Overall the Council considers the broad thrust of Policy DM 7.5 and DM 7.6 as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council is suggesting the following minor change in response to the representation to clarify that the policy applies to extensions. This does not introduce a new policy concept. The principal of the need to submit a retail assessment for relevant development proposals is already established in the policy and the amended wording is simply for the purposes of clarifying that this includes an extension as well as a new build. Suggested minor change at DM 7.5, page 101 Policy DM 7.5 "A Retail Assessment will be required for any development proposal that involves an increase of more than 1,000 m2 (gross) of retail floor space outside any of our Borough's centres. This includes applications for an extension(s) which would result in the overall development exceeding 1,000 m2 gross external area." As regards Policy DM 7.6, the Council would confirm that this policy would apply solely to those proposals for variation and deletion of restrictive conditions where this would result in an increase of more than 1,000 m2 (gross) of retail floor space as indicated in DM 7.5 and thus would be captured on this basis. The assessment of proposals for applications to vary or delete restrictive conditions applying to existing out of centre premises under the 1,000 m2 (gross) threshold would remain a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0107	DfI (Strategic Planning)	DM 7	DfI (Strategic Planning) considers that it is unclear if Policy DM 7.7 applies to Local Centres.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council confirms that Policy DM 7.7 does not apply to Local Centres as defined in the Council's proposed Retail Hierarchy as set out in page 79 of the DPS.
LA03/DPS/0107	DfI (Strategic Planning)	DM 7	DfI (Strategic Planning) consider that it would be useful if Policy DM 7.8(b) clearly defined what is considered to 'small-scale' convenience development.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the term 'small scale' in relation to Villages and Hamlets as self-explanatory and that the assessment of proposals for small-scale retail development in Villages and Hamlets is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations. It is noted that paragraph 6.278 of the SPPS identifies that proposals for shops in villages and small settlements must be consistent with the aim, objectives and policy approach for town centres and retailing, meet local need (ie. day to day needs), and be of a scale, nature and design appropriate to the character of the settlement. The Council considers that there is no material difference between its approach and that of the SPPS.

LA03/DPS/0107	DfI (Strategic Planning)	DM 7	DfI (Strategic Planning) consider that it would be useful if Policy DM 7.9 defined what is considered to be small scale in a countryside context. The policy appears to omit the requirement for proposals to ensure that there will be no unacceptable adverse impact on the vitality and viability of an existing centre within the catchment in line with paragraph 6.279 of the SPPS.	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers the term 'small scale' in relation to the countryside as self-explanatory. Proposals for retail facilities in the countryside are also subject to the sequential test set out under Policy DM 7 and it is considered that the thrust of para. 6.279 of the SPPS is already incorporated within Policy DM 7.2 (c).</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 8	<p>DfI (Strategic Planning) notes that Policy DM 8.1 states that the Council will support the ongoing redevelopment at The Junction in accordance with the terms of the approved Masterplan. Considers that to ensure clarity and consistency with the aforementioned Masterplan, it would be beneficial to incorporate details into the DPS.</p> <p>Regarding Policy DM 8.2, it is noted that Policy DM 7.5 requires a quantitative assessment of impact only if the proposal involves an increase of more than 1,000 square metres gross retail floorspace. As some of the units at The Junction are less than this threshold, it is unclear how a proposal below this threshold will be assessed.</p> <p>DfI (Strategic Planning) considers Policy DM 8.2 does not clarify if the Council will consider any exceptional circumstances. For example, an applicant could easily argue that their particular proposal will not result in a detrimental impact on the vitality and viability of Antrim Town Centre by diverting trade from other retailers within The Junction. Considers that whilst the intention of the policy is clear, further consideration should be given to how this policy will be implemented in practice.</p>	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that there is no need to incorporate the details of the approved Masterplan for the Junction as this is already available on the public record under planning permission LA03/2017/0234/O.</p> <p>As regards the assessment of development proposals at The Junction under the 1,000 square metres threshold as defined in Policy 7.5 this is considered to be a matter for the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations. The Council can also seek such additional information as it considers necessary to allow proper consideration of the impacts of a specific proposal.</p> <p>In relation to the comments regarding the application of Policy DM 8.2, the Council would advise that all applications are considered on their individual merits having regard to the policy provisions of the DPS, relevant guidance and other material considerations. An exception can be made in any given case depending on the specific circumstances arising and this again is a normal part of the development management process.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 9	<p>DfI (Strategic Planning) consider the reference to 'easily accessible' within Policy DM 9 may be open to interpretation.</p> <p>Greater clarification could ensure certainty.</p>	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers the terms 'easily accessible' and 'appropriate locations' as unambiguous and self-explanatory.</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.</p> <p>Policy DM 9 should be read alongside Policy SP 2.15 'Sustainable Tourism' which states, "The Council will promote the growth of a sustainable tourism economy in our Borough. This will be achieved by: (b) Supporting the establishment of new or converted high quality tourism accommodation in 'appropriate' locations where this will broaden the range of accommodation available within our Borough", and Policy SP 3.5 'Integration of Transportation and Land Use'.</p> <p>Policy SP 3.5 clearly states, "The Council will work with its statutory partners to actively promote and manage sustainable patterns of growth that make the fullest use of public transport with enhanced accessibility for all across our Borough".</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 9	DfI (Strategic Planning) consider it is unclear if Policy DM 9 solely relates to proposals outside settlement limits. The Council should also give consideration to how development proposals are 'physically associated'. The proposed policy does not reflect the requirement to demonstrate that no suitable alternative sites are available within a settlement as outlined at SPPS para. 6.260	No specified modification.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation for the purposes of clarification to ensure the policy intent of the text is properly understood. This does not introduce a new policy concept as it is already referenced in the policy, rather the amended text seeks to avoid confusion and make clear the circumstances when a specific locational need must be demonstrated for guesthouse or hotel accommodation.</p> <p>Suggested minor change at Policy DM 9.4, page 104, second sentence Amend 'Elsewhere in countryside locations a specific...' to "In other cases where a guesthouse or hotel accommodation is proposed in a countryside location a specific..."</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 9	DfI (Strategic Planning) consider that whilst Policy DM 9 echoes the requirement set out within para 6.261 of the SPPS, to demonstrate / sustainability benefits of a proposal, it omits the thrust of the policy that such development will be in exceptional circumstances.	To include wording "exceptional circumstances".	<p>No change required. The Council considers the policy as drafted to be appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The Council would indicate that Policy DM 9.9 already refers to 'exceptional benefit' and 'sustainability benefit'.</p>

LA03/DPS/0107	DfI (Strategic Planning)	DM 9	DfI (Strategic Planning) consider the term 'easily accessible' is open to interpretation. Greater clarification with regard to the intended meaning of this terminology could ensure certainty to aid application of this policy.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers the terms 'easily accessible' and 'appropriate locations' as unambiguous and self-explanatory. All policies within the LDP should be read together, This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5. Policy DM 9 should be read alongside Policy SP 2.15 'Sustainable Tourism' which states, "The Council will promote the growth of a sustainable tourism economy in our Borough. This will be achieved by: (b) Supporting the establishment of new or converted high quality tourism accommodation in 'appropriate' locations where this will broaden the range of accommodation available within our Borough", and Policy SP 3.5 'Integration of Transportation and Land Use'. Policy SP 3.5 clearly states, "The Council will work with its statutory partners to actively promote and manage sustainable patterns of growth that make the fullest use of public transport with enhanced accessibility for all across our Borough".
LA03/DPS/0107	DfI (Strategic Planning)	DM 9	DfI (Strategic Planning) consider the term 'satisfactory information' could prove open to interpretation and is considered too flexible. It may be prudent to outline what information will be considered acceptable and/or what information will be required in this regard.	No specified modification.	Noted. The Council will bring forward, if required, specific supplementary guidance in due course specifically relating to the general criteria for Tourism Development.
LA03/DPS/0107	DfI (Strategic Planning)	DM 9	DfI (Strategic Planning) consider it is difficult to understand how Policy DM 9.10 (e) can be accomplished on the basis that the Council's Tourism Strategy has not been adopted in its final form, nor is the draft version available for public to view as part of the DPD's evidence base.	No specified modification.	The Council's Tourism Strategy is publicly available . No change required.
LA03/DPS/0107	DfI (Strategic Planning)	SP 3	DfI (Strategic Planning) considers there is no geographically specific information provided for active travel network, cycle routes or greenways - does not comply with Para. 6.300 of SPPS.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided by the text "Why we have taken this approach". The Council considers this is a matter which will be brought forward at the Local Policies Plan stage in liaison with DfI's Transport Plan. The Council notes that para 6.300 of the SPPS refers to the LDP as opposed to the Plan Strategy stage.
LA03/DPS/0107	DfI (Roads)	SP 3	DfI (Roads) consider the Transportation Schemes listed in Policy SP 3.2 (page 110) are the Council priorities (not the Department's). The Council may want to include the entire A26 Corridor within the policy not just the section south of Antrim.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Policy wording within Policy SP 3.2 is clear that the six priorities identified are the Council's including the upgrading of the A26. Policy wording clearly states, "...to improve connectivity between the M1 and M2". This would infer the Council's priorities include for the future investment of the A26 Corridor as the M1 is outside of Antrim and Newtownabbey.
LA03/DPS/0107	DfI (Roads)	SP 3	DfI (Roads) request the Plan includes an additional section to include historic legacy road schemes. These schemes exist from previous development plans and should be carried through to the new LDP.	No specified modification.	No change required. The Council is content that any new road scheme to be identified in the LPP or DfI Transport Plan will be afforded adequate protection under Policy SP 3.3. The location of legacy road scheme are identified in DfI's Antrim and Newtownabbey Borough Council Local Transport Study para. 5.9. pg. 39. As the Plan progresses the implications of these will be considered in conjunction with statutory partners and reflected in the Local Policies Plan as required.
LA03/DPS/0107	DfI (TPMU)	SP 3	DfI (TPMU) consider Paras 6.14 - 6.16 need re-worded in view of the move from 'Transport Strategy' to 'Transport Study'.	Paras 6.14-6.16 needs re-worded in view of the move from Transport Strategy to Transport Study.	Open to minor change. The Council is suggesting the following minor change in response to the representation given that the terminology now being used by DfI is a Transport Study. Initially DfI TPMU advised it was preparing a Transport Strategy. This has now changed to a Transport Study. This does not introduce a new policy concept as the reference to the document is already in the DPS. This is a central government document which is published by DfI and the suggested change simply reflects the new title of this document. Suggested minor change at para. 6.15, page 115, "by a Local Transport Study..."
LA03/DPS/0107	DfI (TPMU)	SP 3	DfI (TPMU) welcome the Council's commitment to promote the reuse of discussed transport routes and encourage liaising with neighbouring Councils to give priority to developing greenways in line with 'Exercise - Explore - Enjoy: a Strategic Plan for Greenways' published by the Department in November 2016.	No specified modification.	Support noted and welcomed.

LA03/DPS/0107	DfI (TPMU)	SP 3	DfI (TPMU) considers that coherent and connected walking and cycling provision are essential in new developments and should be the default requirements if we are to deliver on the draft Programme for Government commitment to increase the % of overall journeys made by walking, cycling and public transport.	Request replacement of word 'promote' with 'create', and 'encourages' with 'provides'.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text, "Why have we taken this approach".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP1, Positive Planning Note on page 11 and para 1.5. Policy SP 3.5 'Integration of Transportation and Land Use' should be read alongside Policy DM 12 'Active Travel' (Walking and Cycling).</p> <p>The Council notes that the para 6.297 of the SPPS 'promotes' sustainable patterns of development and 'promotes' the provision of adequate facilities for cyclists in new development. The Council considers the word 'promote' as clear and unambiguous, and is consistent with the SPPS.</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 3	DfI (Strategic Planning) note that the Council will seek to ensure that all new development encourages active means of transport, but considers there is no mention of the requirement to identify active travel networks within the Plan.	No specified modification.	<p>No change required.</p> <p>The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text, "Why we have taken this approach".</p> <p>Paragraphs 6.14 - 6.16 of the Plan clearly states, "The Council will work with DfI and other partners to ensure that a high proportion of [additional trips] are conducted by sustainable means (such as walking and cycling". In addition, "The LDP will be supported by a Local Transport Strategy (LTS) prepared by DfI. The LTS will seek to ensure that the transport network and transport needs of the Borough are taken into account in planning for its future development.</p> <p>A Transport Study has subsequently been published by DfI (TPMU) and contains a range of broad measures for walking, cycling, public transport, roads and parking over the plan period. The detailed implications of such measures and any specific schemes proposed will be considered at the Local Policies Plan stage when land use zonings are identified.</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 3	DfI (Strategic Planning) consider the Transport Assessment and Travel Plans policy is inconsistent with Para. 6.303 of SPPS, which identifies reducing the level of private car traffic generated.	No specified modification	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to clarify that the measures to be included in travel plans are intended to promote more sustainable travel patterns and thereby reduce the level of private car use. This is not a new policy concept and the need to reduce reliance on private car transport is already acknowledged in para 6.4 of the DPS.</p> <p>The principle of travel plans is established in the policy the amended text simply clarifies the key aim of travel plans. This is also stated in Government policy and guidance such as the SPPS and DfI Transport Assessment Guidance both of which are material considerations to be read alongside the DPS.</p> <p>Suggested minor change at Policy SP 3.9, page 112. "....more sustainable travel patterns and to reduce the level of private car use."</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 3	DfI (Strategic Planning) consider the reference to Policy DM 10 should read as Policy DM 11.	Amend reference from Policy DM 10 to Policy DM 11.	Noted. A list of typographical errors is set out in the Council's published Draft Plan Strategy Public Consultation Report.
LA03/DPS/0107	DfI (Strategic Planning)	SP 3	<p>DfI (Strategic Planning) consider that the DPS makes no attempt to provide specific Development Management policies to deal with the issue of car parking.</p> <p>No consideration is given to demand management measures to influence a modal shift away from the reliance on the car to more sustainable travel in line with para. 6.301 of the SPPS.</p>	No specified modification.	<p>No change required.</p> <p>The Council considers the policy as drafted to be appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council considers that draft policy wording has already been provided within the DPS at Policy SP 3.10 'Access and Parking', SP 3.11 'Car Parks' and Policy DM 10 'Access and Parking'. In addition to extant policy and the LDP, car parking and demand management measures will be addressed in the Council's forthcoming draft Car Parking Strategy and DfI's Transport Plan.</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Policy SP 3.11 should be read alongside Policy DM 10.</p> <p>Furthermore, the Council considers that the assessment of proposals for car parking, or including car parking, is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.</p>
LA03/DPS/0107	DfI (Roads)	SP 3	DfI (Roads) consider the Plan's reference to Policy DM 10 is incorrect and should read Policy DM 11 (Access to Protected Routes).	Amend reference to Policy DM 10 to Policy DM 11.	Noted. A list of typographical errors is set out in the Council's published Draft Plan Strategy Public Consultation Report.
LA03/DPS/0107	DfI (TPMU)	SP 3	<p>DfI (TPMU) consider that Transport Assessments (TA) are proposed within Policy SP 3.7 as the main tool to ensure that development is a sustainable form from a transport point of view.</p> <p>Consider that TA, even when supported by a Travel Plan, do not in their own make a site accessible or a development sustainable. Suggested policy rewording of Policy SP 3.7 to address this.</p>	Amended policy wording to Policy SP 3.7 to re-state that a Transport Assessment should where appropriate, propose a package of measures designed to promote access to the site by walking, cycling and public transport, while reducing the role of car access as much as possible.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>There are a range of measures in the LDP to ensure that development is sustainable from a transport point of view.</p>

LA03/DPS/0107	DfI (TPMU)	SP 3	DfI (TPMU) considers that in relation to Policy SP 3 coherent and connected walking and cycling provision are essential in new developments and should be the default requirements if we are to deliver on the draft Programme for Government commitment to increase the % of overall journeys made by walking, cycling and public transport.	Request replacement of word 'encourages' with 'provides'.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". All policies in the plan should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5. Policy SP 3.6 clearly states that proposals will be assessed in accordance with DM 12 (in addition to the provisions of the DPS and other material considerations).
LA03/DPS/0107	DfI (TPMU)	SP 3	DfI (TPMU) considers BIA parking provision covered in Policy SP 3.12 is appropriate and the policy wording is clear, however considers this unusual to identify BIA specifically in this way.	No specified modification.	Support from DfI (TPMU) regarding Airport Car Parking Policy is noted and welcomed. The Council recognises that BIA is the largest of the two airports serving the capital of Northern Ireland. In recognition of this, supporting RDS Gateways such as BIA is essential. Therefore, the Council does not agree that it is unusual to identify airport car parking policy within the LDP.
LA03/DPS/0107	DfI (Strategic Planning)	DM 10	DM 10: DfI (Strategic Planning) requests the Council amend policy wording to bring the DPS in line with PFG outcomes and wider sustainability objectives.	Change 'flow of traffic' to 'the flow of people or goods' to read: (b) Access arrangements do not prejudice road safety or significantly inconvenience the flow of people or goods".	Open to minor change. The Council is suggesting the following minor change in response to the representation to clarify that the flow of traffic onto the road network includes both people and goods. This does not introduce a new policy concept as the principle of access is already established in the policy, rather it is a minor rephrasing of existing text for clarification purposes. Suggested minor change at Policy DM 10.1(b), page 118, "Access arrangements do not prejudice road safety or significantly inconvenience the flow of people or goods."
LA03/DPS/0107	DfI (Roads)	DM 10	Policy DM 10.1: DfI (Roads) requested amendment: "There is capacity on the local road network to accommodate...". Requests the word 'local' is removed. Reason: Capacity issue may extend beyond the local roads. Removal of the word will address this concern.	Removal of word 'local'.	Open to minor change. The Council is suggesting the following minor change in response to the representation for the purposes of clarification. The reference in policy to 'local' was intended to convey application of the policy to all roads across the Borough, however it is acknowledged this may be misleading in terms of different road types in the road network. Accordingly, deletion of the word 'local' is suggested to remove any potential for confusion. Suggested minor change at DM 10.1(a), page 118, Deletion of the word 'local' in relation to the road network.
LA03/DPS/0107	DfI (Roads)	DM 10	DfI (Roads) have requested an additional bullet point to Policy DM 10.1 to include cross reference with Policy DM 11: Access to Protected Routes.	Add additional bullet point: "(d) The proposal does not conflict with Policy DM 11: Access to Protected Routes".	No change required. The Council considers that the current policy wording is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.
LA03/DPS/0107	DfI (Roads)	DM 10	DfI (Roads) considers Policy DM 10.2 requires redrafting. Wording 'takes account of' considered as weak. Suggested wording change to 'in accordance with'.	Remove words 'take account of' and replace with 'in accordance with'.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, Why we have this Policy". Supplementary planning guidance, whilst an important consideration, does not carry the same weight as mandatory statutory provisions or policy.
LA03/DPS/0107	DfI (Roads)	DM 10	Policy DM 10: DfI (Roads) support policy text but request the following line to be added : "For the purposes of clarification of the policies in this Plan Strategy, a field gate does not constitute an access."	Amplification section: Add additional line: "For the purposes of clarification of the policies in this Plan Strategy, a field gate does not constitute an access."	Open to minor change. The Council is suggesting the following minor change in response to the representation to clarify that a field gate is not an access for the purposes of the application of the policy. This footnote simply seeks to provides clarification regarding field accesses. It is established practice through the Development Management process based on the advice set out in PPS 3 Access Movement and Parking. Suggested minor change at para. 6.21, page 119, insertion of footnote after "well designed access" to read: "For the purposes of DM 10 and DM 11 a field gate does not constitute an access."
LA03/DPS/0107	DfI (Strategic Planning)	DM 11	Policy DM 11: DfI (Strategic Planning) considers policy appears to be more restrictive than regional policy (para 6.301 of the SPPS) which states that an exception may be considered for motorway service areas where there is demonstrable need.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that it is essential that access onto motorways and high standard dual carriageways is severely restricted. Policy DM 11.1 excludes the potential for new service areas onto such roads within the Borough in light of the existing provision of the two motorway service areas approved along the M2 section within our Borough and no further provision is considered necessary.
LA03/DPS/0107	DfI (Roads)	DM 11	Policy DM 11: DfI (Roads) support policy text but request additional wording to clarify that a field gate does not constitute an access.	Add proposed wording: "For the purposes of clarification, a field gate does not constitute an access".	Open to minor change. The Council is suggesting the following minor change in response to the representation to clarify that a field gate is not an access for the purposes of the application of the policy. This does not introduce a new policy concept as the principle of controlling access on the road network is already established through the policies in the DPS and this footnote simply seeks to provides clarification regarding field accesses. Although this matter is not specifically referenced in the SPPS, it is established practice through the Development Management process based on the advice set out in PPS 3 Access Movement and Parking. Suggested minor change at para. 6.21, page 119, insertion of footnote after "well designed access" to read: "For the purposes of Policies DM 10 and DM 11 a field gate does not constitute an access."
LA03/DPS/0107	DfI (Roads)	DM 11	Policy DM 11.3: DfI (Roads) request for additional bullet points to elaborate on POSITIVE PLANNING NOTE (Pg.11) to clarify that all policies must be read together.	Proposed wording: Policy DM 11.3 (d) Proposals meet suitable other criteria for development within the countryside. Policy DM 11.3 (e) Access to comply with requirements of Policy DM 10.	No change required. The Council considers that the current policy wording is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.

LA03/DPS/0107	DfI (Roads)	DM 11	DfI (Roads) consider Policy DM 11.3(b) should be restricted to proposals of regional significance. The prefix 'sub' should be removed from the wording. Reason for change: The Protected Routes Network are identified routes which facilitate the efficient movement of the travelling public throughout NI. These routes serve right across the province rather than a specific individual council area.	Remove word 'sub' from sub-regional . These routes serve right across the province rather than a specific individual council area. These routes are protected and any additional junctions onto them must have a sound justification. This must be limited, controlled and managed on a regional justification rather than a local council/sub regional basis.	<p>No change required.</p> <p>The Council considers the policy as drafted as appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council acknowledges the importance of the protected route network both to the Borough and the role of facilitating traffic and goods across Northern Ireland. As such, the Council considers that the policy is appropriate to the Borough. The policy has taken account of and is consistent with the SPPS.</p>
LA03/DPS/0107	DfI (Roads)	DM 11	DfI (Roads) consider Policy DM 11.4 (b) should be extended to refer that road safety should also not be compromised. DM 11.4 (b) : Word 'excessive' should be defined. DfI Roads not adverse to introduction of this word.	Additional wording to DM 11.4 (b) "A residential proposal, which assists in the creation of a high quality urban design without compromising standards of road safety and does not result...." Definition to be provided for policy wording "excessive".	<p>No change required.</p> <p>The Council considers the policy as drafted as appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>Road safety is a material consideration which will be considered through the normal Development Management process and in consultation with DfI (Roads). Likewise "excessive" will also be considered in the same way. The policy also refers to the importance of road safety in para 6.24.</p>
LA03/DPS/0107	DfI (Roads)	DM 12	Policy DM 12: DfI (Roads) considers the policy should include reference to walking. Clarification on the distance being considered when using the policy word "nearby". The appropriateness of the word "nearby" or a suitable alternative is difficult to identify. To introduce a specific figure as a distance would not be appropriate as it would 'lock in' a figure.	Add reference to walking to read: "Safe, convenient, attractive walking and cycling linkages to existing or programmed works nearby". Additional text in Amplification section - clarification on the distance being considered when using the policy word "nearby".	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to clarify that linkages can include walking as well as cycling. This does not introduce a new policy concept. It is clear from Policy DM 12 that the intent of the policy is to facilitate walking and cycling and the principle of linkages is already established through Policy DM 12.1 (a) and (b). It is also clear that when the DPS and its evidence base are read together that the Council's intention is to encourage the integration of attractive walking and cycling routes in new development (e.g. Policies SP 3.6 and DM 25).</p> <p>Suggested minor change at Policy DM 12.1 (b), page 121 "...and attractive walking and cycling linkages to...."</p> <p>Whilst the comment suggests that clarification is needed for 'nearby' the Council view is no change is required.</p>
LA03/DPS/0107	DfI (Roads)	DM 12	DfI (Roads) considers that showering and changing facilities should not be restricted to 'major' employment generating developments. The word "major" could be construed as misleading given its use within planning legislation. A suitable amended word should be considered which will also take account of cumulative applications increasing the size of the development.	Removal of word "major". No specific alternative word proposed, but Council to consider a suitable amended word which will also take account of cumulative applications increasing the size of the development.	<p>No change required.</p> <p>The Council considers that the policy is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>In the context of the policy, major is contended to convey larger-scale employment uses and this matter will be for the normal Development Management process which will be considered in line with Transport Assessments. This may be clarified in due course with supplementary planning guidance. 'Cumulative' is also considered through the normal Development Management process.</p>
LA03/DPS/0107	DfI (Roads)	DM 13	DfI (Roads) in relation to BIA, specifically requests for an additional bullet point to include reference to Design and Access Statements and cross reference to relevant road related policies i.e. Policies DM 10, DM 11, DM 12 and DM 25.	Request for additional bullet point to read: "Policy DM 13.2 (c) Proposals should be accompanied by a Design and Access Statement which will take account of Policies DM 10, DM 11, DM 12 and DM 25."	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 14	DFI (Strategic Planning) notes that policy outlines criterion that are expected to be demonstrated within development proposals. This includes requirement to demonstrate the criterion through the submission of 'sufficient information'. Clarification welcomed on how the consideration of 'sufficient information' would be assessed, to provide a degree of certainty for prospective developers/applicants. Policy outlines criterion that are expected to be demonstrated within development proposals. This includes requirement to demonstrate the criterion through the submission of 'sufficient information'.	No specified modification.	<p>No change required.</p> <p>The Council considers the policy as drafted to be appropriate and reasonable and has taken account of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The Council will bring forward, if required, specific supplementary guidance on Public Utilities and Infrastructure in due course.</p> <p>The Council considers that the assessment of proposals for Public Utilities and Infrastructure is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.</p> <p>Policy SP 1.4 Development Impact Assessments states that, "...the Council will require developers to provide impact assessments in association with planning applications where this is necessary to allow proper consideration of the impacts of the development and any mitigation measures proposed.</p>

LA03/DPS/0107	DfI (Strategic Planning)	DM14	Policy DM 14.4: DfI (Strategic Planning) considers the Council should ensure this policy fully aligns with the Odour Assessment Policy applied by NI Water. The distances applied is dependent on the size and scale of the works and therefore may vary from development.	No specified modification.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor changes in response to the representation to clarify the position regarding consideration of development in the vicinity of a waste water treatment works (WWTW) as indicated in the policy headline. The suggested changes do not introduce a new policy concept nor change the substance of Policy DM 14. The amendment of the policy text to follow the headline text is in recognition of a minor drafting error and is suggested to fulfil the policy intent which is to consider the impact of development on a WWTW facility and ensure that it does not prejudice its future operation and this remains the case. This approach accords with position set out in the SPPS which is a material consideration to be read alongside the DPS as set out in Policy SP 1.2. The addition of reference to any NIW guidance produced is to highlight something that would constitute a material consideration, whilst the footnote definition that a WWTW includes a pumping station is a factual clarification.</p> <p>Suggested minor change at Policy DM 14.4, page 127 "Proposals involving development within the vicinity of a wastewater treatment works will only be permitted...."</p> <p>Insertion of new paragraph after DM 14.4:</p> <p>"DM 14.5 In assessing proposals the Council will also take into account the provisions of any relevant policy or guidance produced by Northern Ireland Water".</p> <p>Insert footnote after "...of a waste water treatment works..." to say "For the purposes of this policy a Waste Water Treatment Work (WWTW) includes a Waste Water Pumping Station (WWPS)."</p>
LA03/DPS/0107	DfI (Roads)	DM 15	Policy DM 15: DfI (Roads) considers text satisfactory but requests additional wording relating to compliance with NI Water publication 'Sewers for Adoption, Northern Ireland' (2010).	<p>Request additional line added:</p> <p>"Adoption of streets by DfI (Roads) within a development of this type will only be permitted if the Non-Mains Sewerage system is compliant with 'Sewers for Adoption, Northern Ireland' (NI Water, 2010) and it is the applicant's intention of have same adopted".</p>	<p>No change required.</p> <p>The Council considers the policy as drafted appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The adoption of public streets is a matter outwith the LDP. The Council considers the onus is on the applicant/developer to ensure a development proposals sewerage and other statutory requirements are up to standard.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 16	Policy DM 16.4 (c): DfI (Strategic Planning) considers the term 'indicating' ambiguous and suggests that a developer need only do just that, with no accompanying evidence to demonstrate that criterion have been fulfilled. This is particularly the case with compliance with ICNIRP guidelines and assessment of interference caused by the proposed development.	Change policy word 'indicating'. No alternatives proposed.	<p>No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers Policy DM 16.4 (c) is consistent with paras. 6.243-6.245 of the SPPS.</p> <p>Policy SP 1.4 of the DPS clearly refers to the requirement for developers to provide robust development impact assessments in association with planning applications where this is necessary to allow proper consideration of the impacts of the development and any mitigation measures proposed.</p> <p>All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 16	DfI (Strategic Planning) requests clarity in the policy amplification section regarding the term 'Code System Operators and Broadcasters'.	Clarify in amplification section the term 'Code System Operators and Broadcasters'.	<p>Open to minor change.</p> <p>The Council is suggesting the following minor change in response to the representation to indicate where the definition of a Code Systems Operator can be found. The suggested text is simply a factual reference to where the definition can be found.</p> <p>Suggested minor change at Policy DM 16.4, page 128 After Code Systems Operators insert a footnote to read "As defined under The Communications Act 2003".</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 4	<p>DfI (Strategic Planning) welcomes that the Council has taken on board comments made in respect of the POP regarding the evidence to justify previous growth level. Welcomes in principle the approach to determining the amount of housing growth required.</p> <p>Notes that revised HGI figures have been published for the Borough. Considers the use of the word 'at least' does not provide the certainty expected of a Plan Strategy, whilst establishes a minimum target and therefore is at odds with para. 7.7 of the DPS. Raises the question in respect of the level of housing growth in excess of this figure that the Council might consider appropriate, based on its assessment of the gathered evidence.</p>	<p>Clarification required on the level of residual housing requirement as of 2019. The Council should take account of the revised HGI alongside all other relevant evidence gathered to date to justify the housing requirement.</p> <p>Depending on the methodology or approach this may have variable impact. DfI (Strategic Planning) is of the view that the housing requirement in the Plan should be the amount of housing required to be delivered to meet identified need over the Plan period.</p> <p>As currently worded, the policy creates uncertainty for the public, developers and stakeholders. It would assist in demonstrating Soundness if the Council can show that arriving at an overall housing requirement that it has also taken into account other related policy considerations as well as those in neighbouring council areas.</p>	<p>Residual housing need at April 2018 is identifiable within the Plan's supporting Evidence Paper: 6 Homes by subtracting those units built between 2015 to 2018 from the total housing need. Due to the lead in period required for publication of the DPS, it would have been extremely difficult to include residual figures for the year 2019.</p> <p>HGI: The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. The Council has also been open in its indication (see para. 7.14 and Evidence Paper 6: Homes) that potential for housing delivery, due to the level of commitments, will likely be in excess of this figure and in general housing growth will be fulfilled by land within existing settlement limits.</p> <p>The inclusion of the wording 'at least' in Policy SP 4.2 acknowledges this situation. Once the Housing Growth figure and housing growth allocation have been adopted as part of Plan Strategy, at Local Policies Plan stage, the Council will subsequently consider the sources of housing supply for each settlement in meeting these adopted figures.</p> <p>The Council has now published Topic Paper 1: Housing Growth which further clarifies its position on the matter. This document should be read for further information.</p>

LA03/DPS/0107	DfI (Strategic Planning)	SP 4	<p>DfI (Strategic Planning) strongly welcomes the approach to distributing 80% of total housing growth to the largest three settlements in the Borough.</p> <p>Welcomes the aim of consolidating Crumlin and Randalstown and sustaining and maintaining the role of villages and providing opportunity for housing. Also welcomes confirmation that the allocation has had regard to the RDS Housing Evaluation Framework.</p> <p>DfI is of the opinion that the allocation to the countryside would appear to be conservative when viewed in the context of the proposed approach to well defined sites and 'wall stead' replacement opportunities and offsets any possible reduction through the designation of additional hamlets.</p>	No specified modification.	<p>Support noted and welcomed. However the Council is of the opinion that the figure identified for housing completions in the countryside is an appropriate and reasonable estimation over the time period of the DPS.</p> <p>The Council would like to point out that amendments have also been made to the proposed Policy DM 18 C in comparison to existing rural policy provisions and is of the opinion that this will result in a tightening of the existing policy and therefore a reduction in housing approvals under this policy.</p> <p>It is also considered that opportunities for the replacement of 'wall steads' on well defined sites within the Borough under Policy DM 18B, will not be significant, whilst the exception relating to 'well-defined' sites under policy DM 18A relates solely to the siting of a farm dwelling and will not result in any additional opportunities over and above the normal operation of that policy.</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 4	<p>DfI (Strategic Planning) considers policy wording useful as is the clarification at Para. 7.17 of the DPS. DfI is of the opinion that zoning of additional land can still be justified where it is in line with the sequential approach and would support wider sustainability objectives.</p> <p>Further clarification of what is meant by 'location specific need' would be welcomed. The decision to zone additional land ought still to be supported by robust evidence.</p> <p>Questions if the Council would consider any other measures to support a managed approach to the release of land especially in relation to uncommitted zonings and greenfield land?</p>	No specified Modification	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The Council would advise that 'location specific need' is intended to refer to circumstances where a significant housing need may exist, e.g. Affordable Housing, that it may not be possible to deliver through the existing housing land supply. This is a matter that will be considered in detail at the LPP stage</p> <p>Whilst the Council has not considered a phased approach to the release of housing land at this stage of the DPS, it is a matter which will be considered further at LPP stage, should the release of additional housing sites become necessary following a full and detailed analysis of housing supply at that time.</p>
LA03/DPS/0107	DfI (TPMU)	SP 4	<p>DfI (TPMU) considers the Council's proposed housing allocation as outlined in Table 6 of the DPS, favours the settlements of Metropolitan Newtownabbey, Antrim and Ballyclare yet each of these is likely to add to an already congested (transportation) network as Belfast City employment is proposed to grow. Considers there is no clear statement as to how the Council intend to response to this issue.</p>	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>All the policies of the Plan should be read together. This is made clear in the plan is SP 1, Positive Planning Note on page 11 and para 1.5.</p> <p>By focusing the greatest proportion of growth within the largest settlements of the Borough, the Council considers that this will encourage the most sustainable patterns of development. In taking this approach the Council has taken account of the RDS by concentrating growth where infrastructure already exists. In addition, the Council has clearly stated in the Spatial Growth Strategy that growth is based on existing commitments . Para 7.14 states that there is already an ample supply of land currently available to meet housing growth and that it is anticipated that there will only be a minimal requirement for the zoning of additional housing land. The DPS also seeks to promote the integration of land use planning and transportation, whilst aiming to reduce reliance on the private car through the policies in the LDP.</p> <p>The Transport Plan has a significant role to play in relation to the aspirations of Council's in the greater Belfast area. DfI (TPMU) has now published the Belfast Metropolitan Transport Plan - Local Transport Study (published November 2020). This includes a Local Transport Study for the Council area. As the LDP progresses, the Council will continue to liaise with DfI as respective plans go forward.</p>
LA03/DPS/0107	DfI (Strategic Planning)	SP 4	<p>DfI (Strategic Planning) welcomes the Council's commitment to promote the development of balanced communities and to strengthen community cohesion. Would welcome confirmation that the Housing Needs Assessment has been taken into account.</p>	Clarification is sought on whether the Housing Needs Assessment influenced the distribution of housing growth set out in Table 6.	<p>Support noted and welcomed.</p> <p>The Housing Needs Assessment is one of a range of factors which the Council has taken into consideration in identifying a housing allocation for the Borough. This also includes the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of settlements.</p> <p>The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 17	<p>DfI (Strategic Planning) notes the requirement for well-designed high density proposals at accessible location in Metropolitan Newtownabbey and Towns set out in policy DM 17. The wording appears to suggest that the Council will not set out density requirements for zoned sites.</p>	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>Furthermore, the Council considers that density requirements may be included as Key Site Requirements for zoned housing sites, where relevant, within the forthcoming Local Policies Plan.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 17	<p>DfI (Strategic Planning) have reminded the Council that the SPPS regional strategic approach is that the development plan process is the primary vehicle to facilitate any identified need by zoning land or by indicating through key site requirements where a proportion of the site may be required for social housing.</p> <p>DfI (Strategic Planning) welcomes any policy that will maximise opportunities to deliver affordable units and mixed tenure developments.</p>	<p>The Council should continue to liaise with statutory partners inc. DfC and NIHE to ensure that the evidence underpinning such approaches is robust and measures are in place to support the practical implementation.</p>	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The Council is mindful of the requirements as set out in the SPPS in relation to affordable housing and has and will continue to, work with statutory partners to help deliver its aims, including the publication of supplementary planning guidance, where appropriate.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>

LA03/DPS/0107	DfI (Strategic Planning)	DM 18 A	<p>DfI (Strategic Planning) notes the wording of Policy DM 18.3 and criteria but notes there is no reference to the visual linkage test.</p> <p>In the Department's view, the practical effect of this exception set out in Policy DM 18.4 is to provide a further option to locate a new dwelling away from buildings on the farm.</p> <p>DfI (Strategic Planning) considers that even though the policy is an exception, Policy DM 18A has the potential to undermine the strategic policy approach to clustering as set out within the SPPS. Considers the 'more limited' test is a low test, its practical operation is likely to prove a more difficult subjective assessment. Also queries whether the Council has considered the impact of DM 18.4 on the estimated housing allowance for dwellings in the countryside?</p> <p>Notes that the policy contains no other exceptions in relation to health and safety or verifiable plans to expand farm businesses.</p> <p>Welcomes the retention of the 10 year limitation.</p>	No specified Modification.	<p>Support noted and welcomed. No change required.</p> <p>The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council does not consider the exception provided for in the policy undermines the approach advocated in the SPPS to cluster development in the countryside. This is maintained both in this policy and other policies for development in the countryside e.g. infill and agricultural development. The exception simply acknowledges that there may be occasions when a well-defined site may be superior in terms of integrating a new farm dwelling than siting to visually link with existing buildings on a farm.</p> <p>It should be noted that the exception relating to 'well-defined' sites under Policy DM 18A relates solely to the siting of a farm dwelling and will not result in any additional opportunities over and above the normal operation of that policy. Therefore, it is considered that the estimated housing allowance attributed to the countryside will not be impacted.</p>
LA03/DPS/0107	DfI (Roads)	DM 18	DfI (Roads) considers that access requirements within Policy DM 10 and Policy DM 11 should be referenced within Policy DM 18.	Amendment of the Positive Planning Note on page 11 should address this issue.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The Council considers that the cross referencing of policies is not required as all policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 18 B	<p>Policy DM 18B: DfI (Strategic Planning) notes the wording of the policy which states that the replacement dwelling should not have a visual impact greater than the existing dwelling.</p> <p>Whilst the Department generally welcomes the provisions of the policy, it has concerns regarding the 'wall-stead' exception. The Department considers that this represents a significant weakening of the replacement criteria set out in the SPPS. The other criteria do not provide sufficiently robust policy control.</p> <p>The rep raises a number of questions: (1) How will the meaning of 'long established' be assessed? (2) Has the Council assessed the possible impact of this approach to wall-steads on the estimate/allowance for housing in the countryside under the housing allocation? (3) What evidence/justification is the Council relying on for this departure from the regional policy approach for replacement dwellings in the SPPS.</p>	No specified modification.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy".</p> <p>The Council considers that the assessment of 'long established' will be made through the normal Development Management process, whilst it is considered that opportunities for the replacement of 'wall steads' on well defined sites within the Borough under Policy DM 18B will not be significant and will therefore have limited impact upon the estimated housing allowance for the countryside.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 18 C	<p>DfI (Strategic Planning) welcomes the approach within DM 18C, as is the clarification of a substantial and built up frontage.</p> <p>Considers that, although this departs from the SPPS, it is presumably the approach that the Council considers appropriate in light of local evidence on building patterns.</p>	No specified modification.	Support noted and welcomed.
LA03/DPS/0107	DfI (Strategic Planning)	DM 18 E	DfI (Strategic Planning) have suggested that Policy DM 18E Amplification text in relation to dwellings for non-agricultural business should clarify that the need to provide improved security is unlikely to warrant a site specific need for the purposes of this policy.	Suggested clarification in the Policy Amplification section.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that Policy DM 18E clearly identifies those exceptional circumstances whereby the development of a dwelling would be considered appropriate and therefore it is not necessary to list those circumstances which would not be considered as exceptional under the policy.</p>

LA03/DPS/0107	DfI (Strategic Planning)	DM 18 G	DfI (Strategic Planning) notes that Policy DM 18 G contains no upper limit to the number of dwellings permitted. The Council should consider the implications of this approach for the overall number of affordable housing units developed outside of settlement limits.	No specified modification.	Noted.
LA03/DPS/0107	DfI (Strategic Planning)	DM 20	DfI (Strategic Planning) notes that Policy DM 20 requires a need to be demonstrated and advises that the Council may wish to give consideration to the desirability of reflecting the terms of Policy HS3 (Amended) Travellers Accommodation which states that exceptionally, and without a requirement to demonstrate need, a single family traveller transit site or serviced site may be permitted in the countryside.	Consider policy amendment to make provision for single traveller sites without a need being demonstrated.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy." The Council would point out that Policy DM 20 relates to both within and outside of settlements and would consider it reasonable that such needs would be identified within the local housing needs assessment, undertaken by NIHE. It should also be noted that an application for a single traveller family can still be considered on its individual merits under the normal Development Management process taking account of the provisions of Policies SP 1.2 and DM 18E of the DPS
LA03/DPS/0107	DfI (Strategic Planning)	DM 22	DfI (Strategic Planning) notes that Policy DM 22 intends to take account of guidance set out in Annex A of the Addendum to PPS7 'Creating Quality Residential Developments'. Considers that the Council should be aware that the Addendum will be withdrawn upon the adoption of the DPS. If the Council wishes to continue to rely on this aspect it would be preferable to ensure that its own guidance is in place upon adoption.	No specified modification.	No change required. By including references to existing documents within the Policies of the DPS, the Council considers that it is clear that these will continue to apply following the adoption of the DPS and until such times as the Council brings forward Supplementary Planning Guidance in relation to these matters.
LA03/DPS/0107	DfI (Roads)	DM 22	DfI (Roads) considers that the Council should clarify if the existing planning policies/guidance referenced will still be available when the PPSs are removed. Guidance contained in Annex A of PPS7 may have to be reproduced within this document if this is part of council policy.	No specified modification	No change required. By including references to existing documents within the Policies of the DPS, the Council considers that it is clear that these will continue to apply following the adoption of the DPS and until such times as the Council brings forward Supplementary Planning Guidance in relation to these matters.
LA03/DPS/0107	DfI (Strategic Planning)	DM 23	DfI (Strategic Planning) welcomes support for Policy DM 23.1, however considers Policy DM 23.2 introduces an exception at (b) which is considered an exception to the SPPS, and introduces a further test.	No specified modification.	No change required. The Council considers the policy as drafted to be appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The Council considers the policy wording provides a degree of flexibility to reasonably address proposed development that is ancillary, whilst supporting the principle use of a site for sport and recreation.
LA03/DPS/0107	DfI (Strategic Planning)	DM 24	DfI (Strategic Planning) notes the Council's definition of 'community facilities'. Within SPPS (para. 6.207-6.208, pg.87), sports and recreational facilities are included within the definition of an 'intensive sports facility'. Regional policy for Intensive Sports Facilities is clear at para 6.207, that they should be located within settlements. The exception being sports stadia, which '...may be allowed outside of a settlement, but only where clear criteria is established, which can justify a departure from this approach'. Considers that the Council's approach of supporting this type of development within the countryside is not in line with regional policy and when coupled with Policy DM 24, undermines the Council's own Growth Strategy at Policy SP 1.12.	No specified modification.	Noted. No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The Council states in Policy DM 24.6 that 'community facilities' includes sports and recreation facilities'. It is anticipated that this includes the definition of 'intensive sports facilities' as defined on page 87 of the SPPS. The Council clearly states in para. 8.25 of the DPS, "Whilst the majority of facilities will be located within or adjacent to our Borough's settlements, it is recognised that certain facilities may be acceptable at accessible locations in the countryside where a demonstrable case of need can be made". Policy DM 24.2 'Development within Settlements' clearly sets out an exceptions test for community facilities at accessible locations on the edge of a settlement. Similarly, Policy DM 24.3 'Development in the Countryside' place the onus on the applicant to demonstrate that a new community facility is necessary to serve the local rural population. Policy DM 24 'Community Facilities' therefore supports development within settlements and introduces an exceptions test for proposals that are not. The Council considers that the assessment of proposals for intensive sports facilities is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0107	DfI (Roads)	SP 6	DfI (Roads) considers Policies DM 10, DM 11 and DM 12 must be referenced within Policy SP 6.	Amendment and clarification of the Positive Planning Note should address this issue.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the Strategic Policy is provided in the text "Why we have taken this approach". The Council considers that there is no need for the cross-referencing suggested, as all policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.
LA03/DPS/0107	DfI (Strategic Planning)	DM 25	DfI (Strategic Planning) considers the Council may consider the cross reference of this policy within Policy DM 17 'Homes in Settlements' criteria (a).	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that there is no need for the cross-referencing suggested, as all policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.

LA03/DPS/0107	DfI (Roads)	DM 25	DfI (Roads) considers Policies DM 10, DM 11 and DM 12 must be referenced within this policy.	Amend policy to incorporate cross-referencing to Policies DM 10, DM 11 and DM 12.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council considers that there is no need for the cross-referencing suggested, as all policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para. 1.5.
LA03/DPS/0107	DfI (Strategic Planning)	DM 27	DfI (Strategic Planning) welcomes the Council's approach but considers that policy should make clear that it relates to development permissible in accordance with policies for homes/economic development in the countryside.	No specified modification.	Support noted and welcomed. No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". Policy DM 27.1 relates to ALL development proposals in the countryside not just those specifically relating to homes and economic development. All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5.
LA03/DPS/0107	DfI (Strategic Planning)	DM 28	DfI (Strategic Planning) considers the Council should consider the need for consistency in referring to amenity impacts - elsewhere amenity is referenced differently.	No specified modification.	No change required. The Council considers that the SP and DM policies of the DPS as drafted are appropriate and reasonable and have taken account of the provisions of the RDS and SPPS. The rationale for each policy is provided in the respective text "Why we have taken this approach" and "Why we have this Policy". The Council considers that reference to amenity impacts needs to be considered in the context of the relevant policy under which a proposal is being considered.
LA03/DPS/0107	DfI (Strategic Planning)	DM 28	DfI (Strategic Planning) suggests the Council give consideration to other impacts arising from the type of development, for example shadow flicker as set out in Policy DM 45.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The Council considers that reference to amenity impacts needs to be considered in the context of the relevant policy under which a proposal is being considered. The consideration of the impact of development on amenity is covered in Policy DM 28.1. Policy DM 28.2 supplements this and in any case, the Council considers the text in the third bullet point ".....other forms of disturbance" would include other potential amenity impacts that might arise. In addition, as previously stated, all policies of the plan should be read together. The impacts of wind energy on local communities and residential issues (including shadow flicker) is specifically set out in Policy DM 45.
LA03/DPS/0107	DfI (Strategic Planning)	DM 29	DfI (Roads Service) considers the Plan makes no reference to road safety concerns. Considers that the Council should check with DfI (Strategic Planning) to clarify if the Departments supplementary planning guidance referenced in the DPS will be published on the Council's corporate website once the PPSs are collapsed and removed.	The Council to ensure that its own supplementary planning guidance is in place upon adoption of the DPS.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy". The Council considers that Policy DM 29.1 (e) and para. 9.37 in referencing 'public safety', include road safety. By including references to existing documents within the Policies of the DPS, the Council considers that it is clear that these will continue to apply following the adoption of the DPS and until such times as the Council brings forward Supplementary Planning Guidance in relation to these matters.
LA03/DPS/0107	DfI (Roads)	DM 29	DfI (Roads Service) considers the Plan makes no reference to road safety concerns. Considers that the Council should check with DfI (Strategic Planning) to clarify if the Departments supplementary planning guidance will be published on the Council's corporate website.	The road safety paragraphs within PPS 17 should be referenced or reproduced (paras. 2.10 - 2.11, 4.9 - 4.16).	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this policy". The Council considers that Policy DM 29.1 (e) and para. 9.37 in referencing 'public safety', includes road safety. By including references to existing documents within the Policies of the DPS, the Council considers that it is clear that these will continue to apply following the adoption of the DPS and until such times as the Council brings forward Supplementary Planning Guidance in relation to these matters.
LA03/DPS/0107	DfI (Strategic Planning)	DM 31	DfI (Strategic Planning) notes that Policy criterion DM 31.1(b) which states that "adverse effects are clearly outweighed by social, environmental or economic benefits of strategic importance to our borough" may lessen the level of protection which should be afforded to these designations.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Council does not consider Policy DM 31.1(b) should be removed as it recognises the inherent balancing exercise required in the planning system.
LA03/DPS/0107	DfI (Strategic Planning)	DM 33	DfI (Strategic Planning) considers that Policy DM 33 should reflect the Planning Act 2011 and the SPPS in relation to emphasis on 'enhancement' and where this is not possible the character and appearance of the area should be 'preserved'. Additionally DfI (Strategic Planning) considers that amplification text at para. 10.46 would be better placed within the policy box.	Council should consider whether the amplification text at para. 10.46 would be better placed within the policy text box.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The Guiding Principle for development in a Conservation Area is made clear in Policy DM 33.2 and the Council does not consider the policy wording to be in conflict with the legislative position for Conservation Areas or the text of the SPPS (para's 6.18-6.20). In addition, the Council also considers that para 10.4 is not appropriate text for inclusion within the DPS policy box and should remain as amplification text within the Plan.

LA03/DPS/0107	DfI (Strategic Planning)	SP 8	Policy SP 8.7: DfI (Strategic Planning) states that the Council may need to consider transitional arrangements in relation to the Local Landscape Policy Areas.	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text, "Why we have taken this approach".</p> <p>The Council's LDP transitional arrangements are clearly set out in para 1.12 - 1.17 of the DPS (pages 19-20).</p> <p>The Council considers the Plan's Draft Landscape Character Assessment (as set out in Evidence Paper 16: Landscape Character Assessment) as robust and sufficiently detailed.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 37	<p>Policy DM 37.5: DfI (Strategic Planning) considers the information on designations that have statutory protection is clear.</p> <p>Considers the wording of Policy DM 37.5 in relation to permitting development, "likely to have a significant adverse impact on a Local Nature Reserve or other site identified for its local nature conservation importance" could potentially weaken the regional policy intent of the SPPS.</p> <p>Considers the drafting of Policy DM 37.5 may cause confusion and should align itself more clearly with the SPPS.</p>	No specified modification.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text, "Why we have this Policy".</p> <p>Policy wording in the DPS is stricter than that outlined in para. 6.190 of the SPPS as it requires the applicant to demonstrate a specific locational requirement for development.</p> <p>The DPS clearly states that locally designated sites form an important element in the Region's overall network of nature conservation sites that require appropriate protection from the adverse effects of inappropriate development.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 38	DfI (Strategic Planning) considers the information on designations statutorily protected is clear, however notes that there is an additional criterion at Policy DM 38.1 (b) which appears to widen the exceptions to the policy, and in relation to 'Other Protected Species' (Policy DM 38.2 - DM 38.3) there are wording differences.	No specified modification.	<p>Noted. No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The Council accepts that proposed policy wording widens the exceptions to Policy DM 38.1 European Protected Species. However, the Council will adopt a 'precautionary approach' when considering the potential impacts of development on important natural resources and ecosystem services.</p> <p>The Council is guided by the fact that in Northern Ireland, the protection for European Protected Species is provided by The Conservation (Natural Habitats, etc) Regulations (NI) 1995, as amended.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 39	Policy is generally welcomed by DfI (Strategic Planning) however, it is noted that there is no reference to 'damage' to habitats, species, and features of natural heritage importance, as stated in the SPPS (para 6.192, page 84) - This may serve to weaken the protection afforded by this policy.	No specified modification.	<p>Noted. No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>Policy already states 'is likely to be impacted' i.e. damage or detrimental impact. The Council considers the policy wording as clear and unambiguous.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 40	<p>DfI (Strategic Planning) notes that the Plan's proposed Strategic LPAs include the cross boundary assets of Belfast Basalt Escarpment, Carrickfergus Escarpment and Lough Neagh and Lough Beg shoreline.</p> <p>As boundaries for these will be brought forward in the LPP, it is not clear if the policy for this new type designation will be able to be implemented on existing designations in extant development plans where these assets are spatially defined. There is a presumption against minerals development in these areas and it is questioned how neighbouring councils will deal with these assets.</p>	No specified modification.	<p>Noted. The Council considers the outworking of proposed policy will be undertaken in compliance with the Departments two-stage LDP process.</p> <p>The Council is part of DfE Mineral and Petroleum's Branch, Minerals Working Group, a cross boundary group, and platform to engage with other Council areas.</p> <p>The Council's approach to cross boundary working with neighbouring Council's is clearly set out in para. 2.33-2.35 of the DPS (page 39).</p> <p>The Council considers the issue of how neighbouring council's respond to mineral development is a matter for individual Council's to address within their own LDP process.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 41	<p>DfI (Strategic Planning) acknowledges that a Coastal Policy Area designation is proposed along Belfast Lough.</p> <p>The Council should consider the implementation of this policy as the coast line is shared between a number of Councils. DfI (Strategic Planning) would query how this will be demonstrated in line with the LPP.</p>	No specified modification.	<p>Noted. No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>The DAERA-DfI Coastal Forum groups (3) have been established to consider this in the context of Local Development Plans, as each Council progresses with its DPS.</p>
LA03/DPS/0107	DfI (Strategic Planning)	DM 42	Policy DM 42: DfI (Strategic Planning) welcomes the Council's policy approach. Advises that for trees protected by Tree Preservation Order(s) and/or those in Conservation Areas, the Council must adhere to requirements as set out in planning legislation.	No specified modification.	Support noted and welcomed.

LA03/DPS/0107	DfI (Strategic Planning)	SP 9	DfI (Planning) notes that there is a presumption against fracking, which reflects the SPPS stance.	No specified modification.	Support noted and welcomed.
LA03/DPS/0107	DfI (Strategic Planning)	DM 43	DfI (Strategic Planning) welcomes the addition of the cumulative impacts criterion, however seeks clarification on the evidence base to support the cumulative impacts criterion in Policy DM 43.2 (f). Considers the policy fully reflects the SPPS.	No specified modification.	Support noted and welcomed. Evidence Paper 12: Minerals, chapter 11 'Protecting Natural Heritage and the Historic Environment' sets out the main evidence base relating to Policy DM 43 Minerals Development. In relation to the cumulative impact of minerals development this is already a material consideration and it is acknowledged that these can be significant where sites are located in close proximity. The Council therefore considers it reasonable to highlight that particular attention will be paid to this issue where proposals are proximate to centres of population as more people are likely to be impacted by the impacts of such schemes.
LA03/DPS/0107	DfI (Strategic Planning)	DM 44	DfI (Strategic Planning) questions how Policy DM 44.2 will be applied prior to the LPP stage of the LDP process, in the absence of a defined boundary for the Reserve Policy.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". In relation to how Policy DM 44.2 will be applied in the absence of a defined boundary for the policy, the Council would point to paragraphs 1.15 and 1.16 of the DPS which identifies the transitional arrangements to be applied in such circumstances. The Council notes that the Antrim Area Plan 1984-2001 contains a map depicting the Lignite Policy Area. Appendix 2 and 4 of Evidence Paper 12: Minerals, contain correspondence from DfE GSNI which identifies that other than the Lignite Reserve Policy Area, there are currently no other mineral reserve considerations within the Borough.
LA03/DPS/0107	DfI (Strategic Planning)	DM 45	Policy DM 45: DfI (Strategic Planning) considers that the wording 'address' and 'resolve' is ambiguous.	Considers it would be beneficial if the Council considered policy wording that makes clear all renewable energy development must not give rise to unacceptable adverse impacts in relation to all of the matters set out as (a) - (h).	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". The policy clearly indicates that renewable energy development should be compatible with policies to safeguard and enhance natural heritage and historic environment as well as not bringing forward any adverse impact on other relevant matters, such as public safety or residential amenity. All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and Para. 1.5. As such it is not considered that the policy weakens the protection afforded to the natural heritage through Section 11 of the DPS. The Council notes that Policy SP 1.1 states, "When considering individual development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the Strategic Planning Policy Statement (SPPS)". SP 1.4 states,, "...the Council will require developers to provide impact assessments in association with planning applications where this is necessary to allow proper consideration of the impacts of the development and any mitigation measures proposed".
LA03/DPS/0107	DfI (Strategic Planning)	DM 45	DfI (Strategic Planning) considers Policy DM 45.1 (b) fails to include 'human health' as per paragraph 6.224 of the SPPS.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". Policy DM 45.2 clearly states, "The proposal will be determined through assessment of the details of the development and the extent to which it avoids or mitigates any unacceptable adverse impact". This is a catch all and includes for 'human health'. The Council considers the policy wording as clear and unambiguous.
LA03/DPS/0107	DfI (Strategic Planning)	DM 45	DfI (Strategic Planning) considers Policy DM 45.1 (g) fails to include 'water quantity' as per para 6.224 of the SPPS. Considers this may be an issue specifically with regards to hydropower development proposals.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". Policy DM 45.2 clearly states, "The proposal will be determined through assessment of the details of the development and the extent to which it avoids or mitigates any unacceptable adverse impact". This is a catch all and includes for 'water quality'. The Council considers the policy wording as clear and unambiguous.
LA03/DPS/0107	DfI (Roads)	DM 45	DfI (Roads) consider that it should be clarified if the existing supplementary guidance referenced under Policy DM 45.4 will still be available when PPSs are removed. The Council may need to consider hosting required supplementary guidance on their website for ease of reference.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy". Para 2.24 of the DPS states that the SPPS's transitional arrangements indicate that once the Council's Plan Strategy is adopted , its policies will replace regional operational planning policies comprised of the existing suites of Planning Policy Statements and the remaining extant provisions of the Planning Strategy for Rural Northern Ireland. The Department is also retaining a range of supplementary planning guidance. The Council has indicated in policy wording that it will retain operational planning guidance where relevant and until such times as it brings forward its own supplementary planning guidance.

LA03/DPS/0107	DfI (Strategic Planning)	DM 45	DfI (Strategic Planning) seek clarification on how Policy DM 45.5 'Wind Energy Development' will be implemented in the interim period. Notes that in Group 1, wind turbines will not be acceptable in Strategic Landscape Policy Areas. Considers it is difficult to assess the likely impact of Policy DM 45.5 on wind energy development without knowing the extent of these areas. Considers it is not clear how Group 2 can be applied in respect of the environmental designations or those settlements which have yet to have Settlement Development Limits identified.	No specified modification.	The Council have clearly set out the LDP transitional arrangements in para. 1.12 - 1.7 (pages 19-20) of the DPS. The Council considers the outworking of proposed policies will be undertaken consistent with the Department's two stage LDP process. The Council also considers that the assessment of proposals for Renewable Energy Development - Wind Energy Development and potential impacts arising is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0107	DfI (Rivers)	DM 46	DfI (Rivers) considers Policy DM 46 to broadly align with PPS 15 (FLD 1-5) and the SPPS, however has suggested a minor addition to the policy wording at Policy DM 46.2 to provide greater clarity. Also recommend the Council to liaise with DfI Rivers to ensure a consistency of approach.	Requests that in respect of Policy DM 46.2 that the last line of policy be amended to read, "These should be set out in the accompanying FRA and should demonstrate that: (a) All sources of flood risk to and from the proposed development have been identified; and (b) There are adequate measures to manage and mitigate any increase in flood risk arising from the development.	Open to minor change. The Council is suggesting the following minor textual addition in response to the representation to clarify the requirements of a FRA. This does not introduce a new policy concept. The principle of the requirement for an FRA is already established in the Policy DM 46 and the clarification text simply serves to provide factual information in relation to the requirements of an FRA. The SPPS, which is a material consideration to be read alongside the plan, also sets out FRA policy in paragraph 6.111. Suggested minor change at para. 13.21, page 288, new sentence at end, "It should demonstrate that: (a) all sources of flood risk to and from the proposed development have been identified; and (b) there are adequate measures to manage and mitigate any increase in flood risk arising from the development."
LA03/DPS/0107	DfI (Strategic Planning)	DM 47	DfI (Strategic Planning) considers the Council's policy approach is consistent with the SPPS and Departmental Guidance on the preparation of LDP policies for Flood Risk Management.	No specified modification.	Support noted and welcomed.
LA03/DPS/0107	DfI (Rivers)	DM 48	DfI (Rivers) considers Policy DM 48 reflects the Departments planning policy approach.	No specified modification.	Support noted and welcomed.
LA03/DPS/0107	DfI (Strategic Planning)	DM 50	DfI (Strategic Planning) supports Policy DM 50, but request the Plan cross reference to Policy DM 28 for clarity. Also advises that the Policy should have regard to the need for consistency with the wording of DM 28 'Amenity Impact' which refers to unacceptable adverse impact in amenity. The Council should give consideration of how LDP policy can have regard to any declared local Air Quality Management Areas.	Policy DM 50 should cross reference Policy DM 28 and provide consistent wording.	Open to Minor Change The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". All policies within the LDP should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. as such Policy DM 50 'Pollution' should be read alongside Policy DM 28 'Amenity Impact'. The Council notes that Policy DM 28.2 already includes a cross reference to Policy DM 50. Nevertheless, the Council is suggesting the following minor change in response to the representation for the purposes of clarification and consistency that the assessment of pollution impacts that may arise requires consideration of whether these are considered acceptable or not having regard to the overall degree of impact arising and any mitigation measures proposed. This does not introduce a new policy concept rather it forms part of the normal Development Management process of a balanced consideration of proposals which assesses whether a development would result in demonstrable harm to local amenity or the environment. As such the clarification suggested is supported by the core approach to sustainable development set out in SP 1 of the DPS and the approach advocated in the SPPS. Suggested minor change DM 50.1, page 298 ".....the development will not have an unacceptable adverse impact on local amenity or the environment..." As regards the query re: Air Quality Management Areas, the Council would advise that it undertakes consultation with its Environmental Health Section for development proposals within or close to any such designated areas and these are assessed against the policy provisions of the DPS, relevant guidance and other material considerations as part of the normal Development Management process.
LA03/DPS/0107	DfI (Strategic Planning)	DM 53	DfI (Strategic Planning) supports Policy DM 53 but has suggested some wording amendments. Advises the Council should consider the need for consistency between Policy DM 53.2 which refers to likely significant impact on character and amenity' and Policy DM 28 which refers to 'unacceptable adverse impact'. Advises consideration should be given to referencing the decommissioning of waste plant also in Policy DM 53.9.	Policy DM 53.2 – Provide consistent wording with DM 28. Policy DM 53.9 - Reference the decommissioning of waste plant.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". All the policies of the plan should be read together and in relation to text of Policies DM 53.2 and DM 28 it is not considered that there is any material inconsistency with how the 2 policies are phrased regarding the consideration of impacts. In relation to Policy DM 53.9 the policy wording is consistent with the regional strategic objectives for Waste Management as defined in the SPPS: "To secure appropriate restoration of proposed waste management sites for agreed after-uses" (Para. 6.310, page 111). The policy wording 'aftercare of sites' infers options such as decommissioning, restoration and agreed future uses.

LA03/DPS/0107	DfI (Strategic Planning)	ALL	DfI (Strategic Planning) welcomes the DPS IMF, however, considers it does not clearly identify targets and triggers. The IMF does not identify at what point the trigger will be initiated. Considers it will be difficult to measure policy effectiveness without specific targets to trigger a need for review. Reference to DPPN 6 - Monitoring should provide the basis to trigger any requirement to amend strategy, policies and proposals of the DPD.	The Plans indicative indicators require clearly specified targets and triggers to monitor effectiveness/delivery of SP's.	No change required. The Council considers the Indicative Monitoring Framework as drafted as appropriate and reasonable. As stated in para. 14.10 of the Plan, for the reasons stated, the Council has at this stage produced an Indicative Monitoring Framework which will continue to develop as progress is made on the LDP and will be completed to accompany publication of the Local Policies Plan stage of the LDP.
LA03/DPS/0107	DfI (Roads)	Monitoring	DfI (Roads) notes that within the Indicative Monitoring Framework Policy SP 3 (page 315), refer to a number of strategic transport schemes/improvements delivered by DfI, which are referenced as an indicator to monitor the Plan. Consider that these are deemed inappropriate as delivery of these schemes are the responsibility of DfI and not the Council.	No specified modification.	No change required. The Council considers the Indicative Monitoring Framework as drafted is appropriate and reasonable. The Council considers the indicators used to monitor this desired outcome as reasonable. The LDP acknowledges in para 14.3 that the Council cannot deliver all the outcomes by itself. The Plan reiterates that many key functions associated with physical development rest with other statutory authorities and service providers. The Council therefore will engage with its partners to ensure elements of the Plan outside of its control are effectively reviewed, monitored and implemented.
LA03/DPS/0107	DfI (Strategic Planning)	Evidence Paper 3: Economic Growth	DfI (Strategic Planning) considers that following on from the ELER, the Council's approach to identify and safeguard a range of sites of industry and employment is generally welcomed.	No specified modification.	Support noted and welcomed.
LA03/DPS/0107	DfI (Strategic Planning)	Evidence Paper 3: Economic Growth	DfI (Strategic Planning) notes that the Council did not take forward an earlier proposal to designate a further SEL at Randalstown due to its proximity to Antrim as it was considered that this may detract from the growth of Antrim.	No specified modification.	The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality, this includes Evidence Paper 3: Economic Growth as well as the "Introduction" and "Why we have taken this approach" for Strategic Policy 2. The Council considers that the comments raised have no impact on the soundness of the draft Plan Strategy document. It is noted that DfI (Strategic Planning) raises no concerns regarding the Council not taking forward a Strategic Employment Location at Antrim.
LA03/DPS/0107	DfI (Strategic Planning)	Evidence Paper 7: Historic Environment	DfI (Strategic Planning) notes that Table 1 in Evidence Paper 7: Historic Environment sets out adjoining Council's position in relation to historic issues, however, this is not further considered within the evidence paper or DPS.	No specified modification.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 7. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document.
LA03/DPS/0107	DfI (Water & Drainage Policy Division)	Evidence Paper 11: Public Utilities	DfI (Water and Drainage Policy Division) welcomes information on the water and wastewater network in Evidence Paper 11: Public Utilities, as it sets out the level of available water and wastewater capacity, which is an important aspect to consider when planning for future growth. Requests the Council to update its evidence base to include reference to the 'Living With Water Programme' (DfI, 2020) (LWWP) in Evidence Paper 11 given that this programme will help to address issues at Whitehouse Wastewater Treatment Works. Notes the need for 2-way communication between the Council and NI Water to ensure both parties are aware of the latest position regarding growth and available clean water to help facilitate development. Considers this approach will also help to inform NI Water's business planning, which aims to address future water needs. Welcomes the Council's approach advising developers to contact NI Water early in the development stage to determine if water/wastewater capacity is available for new development.	Requests the inclusion of the following text: "The Living With Water Programme' (LWWP) has been established to progress a Strategic Drainage Infrastructure Plan in order to provide a holistic and integrated approach to drainage. Work has been ongoing to identify and prioritise infrastructure issues which need addressed. Through the LWWP, major issues with the Whitehouse sewerage network system and in particular with regard to discharges in Belfast Lough, have been identified. These issues have the potential to impact on capacity for new connections and may lead to new connections being refused."	The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality for Strategic Policy 3. The Council considers that the comments raised have no impact on the soundness of the draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage. The Council has liaised with NIW in the preparation of the LDP and will continue to do so. The Council will also consult NIW as a statutory consultee in the Development Management process. The Council continues to liaise with DfI re the Living With Water Programme and the Living with Water in Belfast - Integrated plan for Drainage and Wastewater management in Greater Belfast (currently in public consultation November 2020). The Plan references Whitehouse e.g. para 2.84 and in Evidence Papers such as 2 and 11.

LA03/DPS/0107	DfI (Water & Drainage Policy Division)	Evidence Paper 11: Public Utilities	DfI (Water and Drainage Policy Division) considers that as the Council is aware of the locations with wastewater capacity constraints within the Borough, consideration should be given to this matter when zoning land, including the possibility of adopting a phased approach to development.	No specified modification.	<p>The Council notes that DfI request certain matters be considered at the Local Policies Plan stage. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and will give consideration to these matters at the Local Policies Plan stage.</p> <p>The Council has liaised with NIW in the preparation of the DPS and will continue to do so.</p>
LA03/DPS/0107	DfI (Water & Drainage Policy Division)	Evidence Paper 14: Flooding	<p>Evidence Paper 14: Flooding. DfI (WDPD) advise that the reference in the evidence paper at section 2.17 that 'approval for surface water run-off from development will be under the responsibility of the water course management section of the DfI' is incorrect.</p> <p>WDPD advise that the watercourse management section of DfI is DfI Rivers but it does not have the initial responsibility for surface water management. NI Water would be the main party for acceptance of surface water into its systems - with the proviso that DfI Rivers finds any knock-on requirement for discharge to watercourse system.</p>	No specified modification.	<p>Support noted and welcomed. The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy SP 10.</p> <p>The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p>
LA03/DPS/0107	DfI (Water & Drainage Policy Division)	Evidence Paper 14: Flooding	Considers EP:14 para 2.18 should be clarified to avoid any potential for misunderstanding.	<p>Suggest the following wording to be added for clarification purposes:</p> <p>"NI Water will consider all SuDS design standards carefully before accepting them. The acceptance of SuDS design standards by NI Water does not indicate that NI Water will adopt the SuDS system. Any proposal for NI Water to adopt a SuDS system will be carefully assessed against its adoption criteria".</p>	<p>The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality to support SP 10 and its associated DM policies. The Council considers that the comments raised have no impact on the soundness of the draft Plan Strategy document and rather they seek minor textual changes and updating one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p> <p>The Council considers that the assessment of proposals for SuDS is a matter for consideration under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations. The process of adoption of SuDS is a matter for NIW and the applicant. It is the responsibility of the developer to liaise with NIW regarding adoption.</p>
LA03/DPS/0107	DfI (Water & Drainage Policy Division)	Evidence Paper 14: Flooding	DfI (Water and Drainage Policy Division) suggest deleting the text "which is current practice" in Section 4.31 of Evidence Paper 14: Flooding.	Suggest deleting the text "which is current practice".	<p>Support noted and welcomed. The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality to support Strategic Policy 10.</p> <p>The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p>
LA03/DPS/0107	DfI (Water & Drainage Policy Division)	Evidence Paper 14: Flooding	DfI (Water and Drainage Policy Division) considers clarity is needed within the Plan with regard to terminology used, in particular FRMP, designated watercourses, and SuDS and the Water Framework Directive.	<p>Section 8.9 - Clarity needed; only 'designated watercourses are maintained and inspected by DfI Rivers'.</p> <p>Section 8.21 - clarity needed: FRMP are currently being prepared by DfI Water and Drainage Policy Division.</p> <p>Section 12.3 - clarity needed: the Council should seek clarification to confirm there is a legal imperative to consider SuDS in the Water Framework Directive.</p> <p>Amended wording - Section 2.20 - Replace 'The Floods Risks Directive' with 'Flood Directive'.</p>	<p>The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality to support Strategic Policy 10.</p> <p>The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p>
LA03/DPS/0107	DfI (Water & Drainage Policy Division)	Evidence Paper 14: Flooding	DfI (Water and Drainage Policy Division) have expressed their support for the Plan's Evidence Paper 14: Flooding, subject to amendments.	<p>Amended wording - Section 3.2, 3.3, 3.4 and 3.5. See page 3 for clarity.</p> <p>3.2 - date typo (should read as 2017)</p> <p>3.3,3.4 and 3.5 - should refer to the 'Water Framework Directive'.</p> <p>Section 4.22 – Rewording of 2nd part sentence to state that the aim of the Stormwater Management Group is to promote and deliver sustainable drainage systems (SuDs).</p>	<p>Support noted and welcomed. The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 10.</p> <p>The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p>

LA03/DPS/0107	DfI (Strategic Planning)	Evidence Paper 17	DfI (Strategic Planning): Evidence Paper 17: Natural Heritage sets out adjoining Council's position in relation to natural environment issues however this is not further considered within either evidence papers or the DPS.	No specified modification.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality for Strategic Policy 8. The Council considers that the comments raised have no impact on the soundness of the draft Plan Strategy document.
LA03/DPS/0107	DfI (Water & Drainage Policy Division)	Evidence Paper 19: Coast	DfI (WDPD): Reference made Evidence Paper 19: Coast with minor corrections to section 8.2 and 8.14. DfI (WDPD) highlight that coastal Local Councils should collaborate through the DAERA/DfI Coastal Forum, to consider issues and manage risks relating to coastal erosion. Requests that any emerging new coastal-related policies or strategies be incorporated into the Council's LDP publications.	No specified modification.	The Council considers that there is sufficient evidence when the Plan and all its evidence base is read in totality, for Strategic Policy 8. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage. The Council will continue to engage with the Department, statutory partners and other Councils who benefit from a coastline through the DAERA/DfI Coastal Forum Group (3). The Council is content to include a reference to any future coastal-related evidence in forthcoming LDP documentation.
LA03/DPS/0107	DfI (Strategic Planning)	Evidence Paper 6: Housing	DfI (Strategic Planning) welcomes the acknowledgement of the need to take into account windfall sources of housing. The Department's view is that the allowance should be realistic and supported by robust evidence. It is noted that the time period used to inform the windfall allowance is marked by overall lower levels of housing completions and therefore windfall supply. It is unclear if the Council has undertaken further work to establish that commitments are in reality available to contribute to meeting identified need. The methodology of the Strategic Urban Capacity Study, referred to in the housing evidence paper, appears to differ from that set out in PPS 12.	No specified modification.	It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy. As identified on page 72 of the SPPS there are a range of methodologies for calculating windfall and the Council considers that its approach, in conjunction with the Strategic Urban Capacity Study is appropriate and reasonable at this stage of the LDP.
LA03/DPS/0107	DfI (Strategic Planning)	Cross Boundary	DfI (Planning) considers the cross boundary Issues of relevance to the Council include: (1) Housing and the shared Belfast Housing Market Area, (2) the Metropolitan Transport Network, and (3) the environmental designations such as the Lough Neagh and Lough Beg and other shared environmental assets. The Council should be able to demonstrate that policy in respect of cross boundary designations does not conflict with the DPDs of neighbouring councils.	No specified modification.	Noted. The Council has clearly set out its position regarding neighbouring councils and the preparation of Local Development Plans in paras. 2.33-2.35 of the DPS. The Plan clearly states, "It is a requirement that each Council, in preparing its new LDP, has regard to relevant plans, policies and strategies relating to adjoining Councils and where cross boundary issues are relevant, it should be established if the LDP conflicts with the plans of neighbouring Councils". Cross boundary considerations and conflict is also demonstrated in the published evidence papers. The Council notes that DfI have not raised any specific conflict issues. The Council is satisfied that there is no conflict and the Plan is sound. Please refer as well to the Council's LDP Soundness Report . The Council will continue to work with neighbouring authorities as the Plan progresses. This is particularly important in relation to the delivery of key elements of the RDS.
LA03/DPS/0107	DfI (Strategic Planning)	SA	DfI (Strategic Planning) urge the Council to seek legal advice to ensure that all the procedural requirements have been met, including SA, SEA and HRA. Reiterates that the responsibilities for these matters rests with the Council.	No specified modification.	The comments from DfI in relation to the SA, SEA and HRA in relation to legal compliance is noted. The SA Scoping Report includes a Compliance Checklist in Appendix 1. Appendix 4 of the HRA sets out the approach to the assessment as per the Regulations. The Council has also published its own Soundness Assessment.
LA03/DPS/0107	DfI (TPMU)	Whole Plan	DfI (TPMU): No compelling reason to consider DPS to be unsound when policies are read together and will allow the planning and delivery of sustainable development from a transport point of view.	No specified modification.	Support from DfI TPMU that the Plan is sound is noted and welcomed. The Council will continue to work with its strategic planning partners to deliver its LDP.
LA03/DPS/0107	DfI (Strategic Planning)	Whole Plan	DfI (Strategic Planning) welcomes the structure of the document including setting Strategic and Development Management policies in the context of the strategic objectives of the Plan. DfI (Strategic Planning) considers the approach to highlighting the link with the Council's Community Plan is also clear.	No specified modification.	Support noted and welcomed.

LA03/DPS/0107	DfI (Strategic Planning)	Whole Plan	DfI (Strategic Planning) notes the approach in relation to future LDP designations and zonings which will come forward at the second stage of the LDP process. The boundaries of settlements, local designations and zonings in the extant development plans will apply in the decision making process until confirmed in the LPP. Considers the Council may wish to consider implementation of policies which relate to yet undesignated boundaries or zonings.	No specified modification.	No change required. The Council's LDP approach regarding the Draft Plan Strategy and Local Policies Plan is clearly set out in paras. 1.3-1.11 of the DPS. In addition, paras 1.12-1.17 set out the Council's LDP transitional arrangements and compliance with the Departments two -stage LDP process as set out in the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.
LA03/DPS/0107	DfI (Roads)	Whole Plan	DfI (Roads) is not satisfied with the DPS and deem it as unsound.	Requests the Council to consider each of the points made and to address each in turn.	Noted. The Council strongly disagrees with this statement and has responded in detail to all pertinent points raised by DfI (Roads).
LA03/DPS/0108	Invest NI	SP 1	Invest NI caution against the application of the developer pays principle in respect of public sector developments where wider societal benefits are the driving force rather than profit. Welcomes the use of the word "appropriate". Welcomes opportunity to engage on developer contributions supplementary planning guidance.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council intends to bring forward supplementary planning guidance on developer contributions in due course and would advise such SPG will be subject to consultation.
LA03/DPS/0108	Invest NI	SP 1	Invest NI welcome the opportunity to engage with the Council regarding the development of guidance in relation to Contributions.	No specified modification.	Support noted and welcomed.
LA03/DPS/0108	Invest NI	SP 2	Invest NI welcomes the confirmation that the Council is committed to promoting a vibrant economy, assisting existing employers, attracting new firms and supporting business start-up.	No specified modification.	Support noted and welcomed.
LA03/DPS/0108	Invest NI	SP 2	Invest NI note the Council intend to ensure an adequate supply of suitable employment land and that strategically important employment locations are safeguarded. Invest NI suggest that such protection should be afforded to all employment lands unless, there is a compelling case for a change of use and that any change would not result in an overall significant diminution of employment lands.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". Local Employment Sites will also be protected and alternative uses only considered in certain circumstances as set out in SP 2 and DM 1. Non zoned sites will be assessed on their own merits through the normal Development Management process.
LA03/DPS/0108	Invest NI	SP 2	Invest NI welcomes the identification and safeguarding of land for economic development as it believes that the availability of a range of sizes and locations of such land is an important factor in attracting investment. Contend that the SELS in Global Point and Antrim Technology Park offer potential investors to NI with a highly attractive investment and development proposition.	No specified modification.	Support noted and welcomed.
LA03/DPS/0108	Invest NI	SP 2	Invest NI considers the DPS economic elements are largely in conformity with the Council's Community Plan, the RDS, PPS 4 and the SPPS.	No specified modification.	Support noted and welcomed.
LA03/DPS/0108	Invest NI	SP 2	Invest NI refers to Paragraph 5.12 of the DPS and notes that outside of larger settlements, the Council does not propose to designate employment lands. The flexibility that this policy provides in smaller settlements is to be welcomed.	No specified modification.	Support noted and welcomed.
LA03/DPS/0108	Invest NI	SP 2	Invest NI advises that in relation to the Council's intention to identify Local Employment Sites, a variety and choice of investment locations is to be welcomed.	No specified modification.	Support noted and welcomed.
LA03/DPS/0108	Invest NI	DM 1	Invest NI advises that the Council should consider providing guidance on the range and scale of uses it would consider to be acceptable at each SEL.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Policies SP 2 and DM 1 set out the uses acceptable at each SEL. The Council will give consideration to the provision of further guidance on appropriate uses for specific economic development sites at the LPP stage.

LA03/DPS/0108	Invest NI	DM 1	Invest NI note that it is stated in the DPS that in certain circumstances, comprehensive mixed use redevelopment schemes may be acceptable where this introduces community gains and allows vacant or underused land to return to productive use. Invest NI ask that Local Employment Sites are afforded strong policy protection as they can provide opportunities to those businesses for which a setting within a SEL may not be suitable.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Local Employment Sites will also be protected and alternative uses only considered in certain circumstances as set out in SP 2 and DM 1.
LA03/DPS/0108	Invest NI	DM 1	Invest NI considers the provisions of Policies DM 1.1 & DM 1.2 are consistent with PED 7 of PPS 4 and para. 6.89 of the SPPS. Invest NI welcomes the protection of SELs from competing land uses beyond a sui generis employment use that will not lead to a significant diminution of the role of the SEL.	No specified modification.	Support noted and welcomed.
LA03/DPS/0108	Invest NI	DM 1	Invest NI would highlight that the provisions of DM 1.3 - DM 1.5 could represent a departure or at least a relaxation of the protection afforded to such land through PED 7 of PPS 4 and para. 6.89 of the SPPS.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The policy seeks to provide reasonable flexibility for alternative uses on economic development lands that are considered as no longer used or have demonstrated potential for beneficial reuse in accordance with the policy provisions of DM 1.
LA03/DPS/0108	Invest NI	DM 1	Invest NI consider the 12-month timeframe stipulated in Policy DM 1.4 (a) as too low as it does not allow sufficient time for a property to be marketed and a new owner identified. Consider that a 36-month timeframe to be more appropriate. Consider Policy DM 1.4 (b) 'marketing of the site' does not provide sufficient detail on the evidence required to meet the terms of this policy. Requests the Amplification of this policy would be helpful in identifying the robust evidence required to allow such a loss of an economic development land resource (Invest NI provide a number of examples of evidence and thresholds which the Council could consider). Invest NI note that the draft Plan Strategy has no policy mechanism or timetable which could facilitate the review of the loss of LES land.	Suggests that 36-months might be more appropriate. Would suggest that amplification of this policy would be helpful in identifying the robust evidence base required to allow such loss of an economic development land resource. May also be prudent to consider the suitability of introducing a threshold for the number of LES, or quantity of LES land that could be released in this way, or a minimum quantity of such land that should be retained, over any given period, such as a LDP review cycle.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The applicant will have to meet all the criteria (a) - (c) including 12 months marketing. The onus will be on the applicant to demonstrate marketing attempts which will be considered through the normal Development Management process. The Council will monitor the amount of employment land in the Borough on a yearly basis through the Annual Monitoring Report, to ensure there is a supply of sufficient land and a threshold is not required as remaining capacity will be assessed in each main settlement. Chapter 14 of the Plan Strategy sets out the monitoring of the plan and the timeframe is set out in the Council's published Timetable which is kept under review.
LA03/DPS/0108	Invest NI	DM 2	Invest NI considers the provisions of policy DM 2 largely align with the policy provisions of para. 6.88 of the SPPS and PED 2 - 6 inclusive of PPS 4.	No specified modification.	Noted.
LA03/DPS/0108	Invest NI	DM 2	Invest NI considers Policy DM 2.8 represents a slight amendment from PPS 4 Policy PED 4, which makes some exceptions for potential social and affordable housing developments on former business/industry sites in the countryside.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". There is no requirement for this matter in the SPPS and the Council has received no applications for affordable housing on former business/industry sites. In addition, policy DM 18G will assist in the delivery of affordable housing in the countryside.
LA03/DPS/0108	Invest NI	DM 3	Invest NI considers the provisions of this policy are consistent with Policy PED 8 of PPS 4 and para. 6.90 of the SPPS. Invest NI notes the policy commitment to apply Policy PED 8 supplementary planning guidance.	No specified modification.	Noted.
LA03/DPS/0108	Invest NI	DM 5	Invest NI considers the provisions of this policy are consistent with Policy CTY 21 of PPS 4 and para. 6.87 of the SPPS.	No specified modification.	Noted.

LA03/DPS/0108	Invest NI	DM 6	Invest NI welcomes the Council's commitment to support a diverse range of retail and complementary uses within the Borough's centres provided these support rather than detract from the successful functioning of the centres. Suggests that the Council might wish to clarify what is an 'acceptable complementary use' in Policy DM 6 and indicates that this should include Class B1 (a) office use.	Whilst there is no specified modification, Invest NI suggests that B1 (a) Business Use should be identified as an acceptable use in the Policy or its amplification.	Open to minor change. Overall the Council considers the broad thrust of Policy DM 6 as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Nevertheless, the Council is suggesting the following minor textual changes in response to the representations for the purposes of clarification. These do not introduce a new policy concept. It was always the intention of the policy to recognise and promote the positive role of our Borough's centres as the most appropriate locations for retail development and other main town centre uses. The preceding paragraphs 5.39 and 5.40 make it clear that Policy DM 6 applies to the Borough's town, district and local centres i.e. the identified centres as set out in Table 4 of Policy SP2. Furthermore, it is clear when all the policies within the LDP are read together (as indicated in Policy SP 1, Positive Planning Note on page 11 and Para. 1.5) that the reference to complementary use in Policy DM 6 is self-explanatory. The concept of complementary town centre uses is also stated in the SPPS and defined in footnote 58. As indicated in SP 1 the SPPS is a material consideration to be read alongside the DPS. Suggested minor change DM 6.1, page 98 "The Council will encourage and support a diverse range of retail and complementary town centre uses within our Borough's identified centres..." Insertion of footnote for complementary uses: "Complementary town centre uses include cultural and community facilities, leisure, entertainment and business uses, including offices."
LA03/DPS/0108	Invest NI	SP 3	Invest NI notes that the Council will work with statutory partners to actively promote and manage sustainable patters of growth. Key element of this will be for new developments to bring forward measures that will promote enhanced pedestrian and cycle linkages to surrounding services and facilities (SP 3.5 (e)). Invest NI offers no objection in principle to this but would remind the Council that for industrial developments, there may be public safety issues.	No specified modification.	Noted.
LA03/DPS/0108	Invest NI	Evidence Paper 3: Economic Growth	Invest NI would contend that none of its property, particularly Antrim Technology Park and Global Point, should be considered as either vacant or underused. They advise their property benefits from appropriate planning permissions granting approval for industrial development.	No specified modification.	The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality, this includes Evidence Paper 3: Economic Growth as well as the "Introduction" and "Why we have taken this approach" for Strategic Policy 2. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.
LA03/DPS/0109	Gary Bates (Jobling Planning & Environment)	Plan Vision	Mr. Bates welcomes the Plan Vision and agrees that the LDP should result in the Borough being an 'excellent, attractive and diverse place in which to live and work' and agrees that 'development should be sustainable'.	No specified modification.	Support noted and welcomed.
LA03/DPS/0109	Gary Bates (Jobling Planning & Environment)	Strategic Objectives	Mr. Bates supports Strategic Objectives 1, 7 and 8.	No specified modification.	Support noted and welcomed.
LA03/DPS/0109	Gary Bates (Jobling Planning & Environment Ltd)	SP 1	Mr. Bates indicates support for the Spatial Growth Strategy and for the classification of Metropolitan Newtownabbey as a Tier 1 settlement and agrees that the main focus of growth should focus in the Metropolitan Urban Area. Considers that Spatial Growth Strategy policy SP 1.6(a) is potentially compromised through SP 1.6(e) by allowing disproportionate growth in the smaller settlements /countryside, while the focus should remain in the urban centres.	No specified modification.	Support noted and welcomed. The Council considers that the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council considers that the Spatial Growth Strategy is not compromised, as the approach clearly attributes core growth to top tier settlements, whilst the rural area will be sustained and maintained through small scale housing and employment opportunities.

LA03/DPS/0109	Gary Bates (Jobbing Planning & Environment)	SP 4	Mr. Bates considers that the housing allocation as proposed over allocates to the countryside to the detriment of the Metropolitan Newtownabbey allocation. Considers the allocation of almost 8% growth to the countryside is disproportionate to the population demographic and appears to conflict with the objective of focusing growth in urban areas and does not take account of the RDS.	The Plan needs to update/increase the allocation within Metropolitan Newtownabbey to focus growth to service the surrounding rural area.	No change required. It is considered that the 3,900 unit housing allocation proposed for Metropolitan Newtownabbey is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Metropolitan Newtownabbey. It is considered that an increase in the overall housing allocation to Metropolitan Newtownabbey would be at odds with the considerations identified above. Rather than being an allocation to the countryside, the 750 units estimation for the plan period occurs as a function of the regional rural policy direction contained within the SPPS and reflected within the rural housing policies contained within the draft Plan Strategy. The DPS's evidence base for the housing allocation is set out in Evidence Paper 1: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.
LA03/DPS/0109	Gary Bates (Jobbing Planning & Environment)	Site Specific	Mr. Bates requests subject lands be considered for housing development: Metropolitan Newtownabbey.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0109	Gary Bates (Jobbing Planning & Environment)	DM 48	Mr. Bates is generally supportive of the principle of minimising flood risk for development in close proximity to controlled reservoirs, however considers that the onus should be on the owner/operator of such a reservoir to ensure it is safe and duly maintained, rather than sterilising development down slope. Considers it is unreasonable to curtail the development potential and the most efficient use of otherwise developable land within urban areas, without first taking steps to require dam monitoring and improvement is undertaken by the owner. For reservoirs without condition assurance it is unclear as to the extent to which the policy applies in or around such reservoirs. The opening wording of Policy DM 48.2 places a restriction on 'development', but its lacks sufficient clarity to ascertain the extent to which this policy applies. Is this just development of the reservoir itself or in the vicinity of it? In cases where Condition Assurance has already been given, this should be material when considering applications from other applicants who are unable to provide assurance owing to having no control over the reservoir/dam.	Current policy appears to merely restrict new development; places no obligation on current owners to protect the existing surrounding area, through monitoring or repair works. Policy wording to clarify the need for the 'owners of a reservoir' to undertake regular dam monitoring and improvement.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Reservoirs are an acknowledged source of flood risk with the potential for rapid inundation downstream should the structure fail or be overtopped. As such the need to control development within the potential inundation area of a controlled reservoir is an important material consideration in the planning process. In line with the broad thrust of regional policy as set out in the SPPS Policy DM 48 of the DPS introduces a broad presumption against development within the flood plain of a controlled reservoir which is not accompanied by condition assurance. It is considered that on proper reading of the policy and its amplification that it is clear the policy applies to development within the potential inundation areas of such reservoirs not just the reservoir itself. This policy forms part of the precautionary approach adopted by the Council to the consideration of flood risk from all potential sources of flooding. The Council would advise that it is not the role of the LDP either to monitor or enforce the need for condition assurance of controlled reservoirs, rather this is a matter that rests with the Department for Infrastructure Rivers who are responsible for regulating these structures under the provisions of the Reservoirs Act (Northern Ireland) 2015. The Council would confirm that its works closely with DfI Rivers in the assessment of proposals within the potential inundation area of a controlled reservoir and both the Council and DfI accept that where condition assurance has recently been provided for a such controlled reservoir this is an important consideration in determining proposals made by third parties.
LA03/DPS/0110	South Bank Square Ltd (Turley)	Plan Vision	South Bank Square Ltd welcome and broadly supported the Vision but the Plan period should be extended to 2035. It is anticipated that the LLP part of the Plan will not be adopted until the end of 2023/2024. This is unrealistic and would leave only four or five years of a plan period to 2030. A longer plan period to 2035 is required to increase the potential for the plan to take account of the RDS and achieve its own Spatial Growth Strategy.	Extend plan period to 2035.	Support for Plan Vision is noted and welcomed. No change required. The DPS has been published in accordance with the Timetable. It will be kept under review. A new Timetable was published in October 2020. The Plan period does not need to be extended to 2035 to deliver a 5 year housing supply as there is already an adequate supply of housing in the Borough. The Plan will be reviewed every 5 years and if there is an unexpected shortfall in housing supply, a Plan revision can be prepared to address this matter.
LA03/DPS/0110	South Bank Square Ltd (Turley)	SP 2	South Bank Square Ltd suggest the Council's target for job growth could be more ambitious in the context of the current employment levels. There is a coherence issue between employment and housing allocations. Housing should be commensurate with employment.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken into account the provisions of the RDS and SPPS . The rationale for the strategic policy is provided in the text "Why we have taken this approach". This indicates that the potential growth of up to 9000 new jobs in the Borough is derived from the Council's Economic Strategy which is considered an appropriate evidence base.
LA03/DPS/0110	South Bank Square Ltd (Turley)	SP 4	South Bank Square Ltd consider that the Housing Growth Figure is set too low. The general principle of exceeding the HGI is welcomed, however there appears to have been no consideration of the critical role that the level of new housing has in attracting and retaining a labour force for 9000 new jobs and a potential labour shortage that may occur as a consequence of a HGI growth rate of 650 dwellings per year.	The Borough's overall housing allocation should be increased, potentially to the 13,000 units as set out in the POP.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. It is not considered that the projected HGI growth rate of 650 dwellings per year will result in any potential labour shortage.

LA03/DPS/0110	South Bank Square Ltd (Turley)	SP 4	South Bank Square Ltd considers that the Housing Allocation across the Borough under allocates to largest the settlements with potential to undermine the Spatial Growth Strategy which focusses growth in Metropolitan Newtownabbey and Antrim. The Housing Allocation does not take account of the RDS in directing a sufficient scale of growth to these settlements and furthermore does not sufficiently recognise the cross boundary connection with Belfast.	Metropolitan Newtownabbey (in particular) and Antrim should receive the majority of the proposed additional allocation. (3,250 units)	<p>No change required. The Council does not consider that an increase in the overall housing allocation for the Borough is required. In this context, it is considered that the 3900 unit housing allocation proposed for Metropolitan Newtownabbey (which constitutes 40% of the overall growth allocation) is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Metropolitan Newtownabbey.</p> <p>Whilst reliance for an uplift in the Borough's housing allocation for Metropolitan Newtownabbey and Antrim is made within the representation on the need to accommodate the growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.</p> <p>The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0110	South Bank Square Ltd (Turley)	SP 4	South Bank Square Ltd considers that the Housing Allocation across the Borough under allocates to largest the settlements with potential to undermine the Spatial Growth Strategy which focusses growth in Metropolitan Newtownabbey and Antrim. The Housing Allocation does not take account of the RDS in directing a sufficient scale of growth to these settlements and furthermore does not sufficiently recognise the cross boundary connection with Belfast.	Metropolitan Newtownabbey (in particular) and Antrim should receive the majority of the proposed additional allocation. (3,250 units)	<p>No change required. The Council does not consider that an increase in the overall housing allocation for the Borough is required. In this context, it is considered that the 2750 unit housing allocation proposed for Antrim (which constitutes 28.2% of the overall growth allocation) is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Antrim.</p> <p>Whilst reliance for an uplift in the Borough's housing allocation for Metropolitan Newtownabbey and Antrim is made within the representation on the need to accommodate the growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.</p> <p>The DPS's evidence base for the housing allocation is set out in Evidence Paper 2: Settlement Evaluation, Evidence Paper 6: Housing and Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0110	South Bank Square Ltd (Turley)	SP 4	South Bank Square Ltd suggest that there is an over reliance on committed housing sites, some of which are not delivering sufficient housing to achieve Policy SP 1.6 (a) of the Spatial Growth Strategy. In support of this a Technical Paper submitted with the representation highlights differences between the Council's figures published in Evidence Paper 6: Housing and observations carried out by the objector.	The housing evidence base should be reviewed to ensure that it represents a robust level of deliverability such that the potential need for any additional land for housing can be properly identified.	<p>It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated with Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.</p> <p>The Council notes that the Technical Paper contains a number of figures which differ from those published in Evidence Paper 6: Housing, which the objector describes as inaccuracies. The Council considers that rather than inaccuracies, the parameters used by the objector may differ from those employed by the Council in the respective studies and therefore explain the variation. For example the base date of each study and what is determined to be a 'completed' unit, may differ. Furthermore, unlike the Council, the objector has used current applications and PANs within their observations, while the Council only attributes applications to a particular zoned housing site once they are approved within the relevant survey year.</p>
LA03/DPS/0110	South Bank Square Ltd (Turley)	Site Specific	South Bank Square Ltd request that subject lands be considered for housing development: Metropolitan Newtownabbey	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0110	South Bank Square Limited (Turley)	Miscellaneous	South Bank Square Ltd considers the latest version of the Local Development Plan (LPD) timetable, dated July 2018 sets out the publication of the DPS in Q4 2018/2019. They acknowledge that this was an estimate, however in practice the DPS was published in Q2 2019/2020; 4 months after the agreed date set out in the timetable. In line with the direction set out in the Act, they would respectfully suggest that consideration should be given to modifying the timetable.	LDP Timetable be modified/updated.	<p>Noted.</p> <p>The DPS was published in Quarter 1 of business year 2019-2020. At that time DfI has advised all Councils that publication of a DPS three months either side of the estimated date as set out in the Council's Timetable would be acceptable. The Council met this target and will continue to keep the LDP Timetable under review and the Local Development Plan progresses. A new Timetable was published in October 2020.</p>
LA03/DPS/0110	South Bank Square Limited (Turley)	SA	South Bank Square Ltd express concern that all three options for SP 4: Homes (Housing Allocation) are now based upon a reduction in housing growth compared to that presented in the POP. These distribution options are not sound however on that basis that the actual housing growth option selected in the 2017 and 2019 SA are identical in terms of dwellings per annum. There is evidently no reduction in housing and therefore distribution options based upon a reduction in housing from the POP are clearly unsound and unrealistic reasonable alternatives which do not provide stakeholders with an accurate reflection of the sustainability impacts of the DPS.	Request the following changes: (1) reasonable alternatives for housing growth to ensure they meet the guidance of a reasonable alternative and the housing demand; (2) Reappraise all reasonable alternatives for housing growth (including those within the POP). (3) Identify new housing distribution options that reflect the growth (not reduction) in housing options and consider that Mallusk is an area of significant economic growth and therefore justifies allocations to locate housing close to the economic need; and (4) Identify/appraise all proposed site allocations against the SA framework and present clear reasons for the selection/rejection of sites within the SA document; and (5) Publish a revised SA for consultation prior to examination.	<p>The Council notes the comments made by Turleys on behalf of South Bank Square Limited in relation to the SA Report.</p> <p>The SA Report published alongside the POP was an interim report and was subject to public consultation. The interim report was produced at a point in time. It was updated along with the Scoping Report in preparation of the Council's DPS which sets out Strategic Policies and Development Management Policies proposed to deliver the Council's LDP.</p> <p>Following public consultation on the Council's Preferred Options Paper, a number of responses were received including DfI who suggested that it was not robust to include a 5 year housing supply in the calculation of housing need as set out in the POP. Therefore the Council reduced the housing allocation figure and redistributed growth across the settlements. Therefore the Council considers that it has considered reasonable alternatives in relation to Housing Growth. Information is set out in Topic Paper 1.</p> <p>The Council published a Preferred Options Paper Consultation Report which was made available at the same time as the DPS so that interested parties were furnished with a summary of the POP/Assessment responses and how the Council took them into account in preparing the DPS. The DPS also contains information on how it was developed. The SA Report also contains information on how it was developed. Information is also provided on the guidance and legislation taken into account in its preparation.</p> <p>Appendix 4 of the SA Report sets out the reasoning for the policy scoring and the options considered. A legislative checklist is also published. The Council has also published a soundness compliance statement.</p> <p>A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. The LPP will be subject to SA appraisal.</p>

LA03/DPS/0110	South Bank Square Limited (Turley)	SA	<p>South Bank Square Ltd in relation to the Selection and Rejection of the Preferred Housing Growth Options, express concern that the SA is deficient regarding the SA's legal and procedural requirement. In relation to the selection and rejection of the Preferred Housing Growth Options the SA fails to assess the housing to be delivered in the plan period (9,750) and therefore fails to meet the requirements of the plan period. Also advises the 2017 SA assessment was unsound. Raises concerns regarding lack of evidence to support the significantly improved SA scoring for the same housing growth option within the 2019 and 2017 SA; differences between the scoring in 2017 SA in relation option 2 compared to scoring of Option 1; no reasons provided for the rejection of POP options and that the 2019 assessment does not comply with UK Planning Practice Guidance in relation to reasonable alternatives being sufficiently different in order to identify their different sustainability impacts.</p>	<p>Requests that the reasonable alternatives for housing growth meet the guidance of a reasonable alternative and the housing demand; reappraise all reasonable alternatives including those within the POP, identify new housing distribution options that reflect the growth (not reduction) in housing options and consider that Mallusk is an area of significant economic growth and therefore justifies allocations to locate housing close to the economic need and identify/appraise all proposed site allocations against the SA framework and present clear reasons for the selection/rejection of sites within the SA document and publish a revised SA for consultation prior to examination.</p>	<p>The Council notes the comments made by Turleys on behalf of South Bank Square Limited in relation to the SA Report. The SA Report published alongside the POP was an interim report and was subject to public consultation. The interim report was produced at a point in time. It was updated along with the Scoping Report in preparation of the Council's DPS which sets out Strategic Policies and Development Management Policies proposed to deliver the Council's LDP.</p> <p>Following public consultation on the Council's Preferred Options Paper, a number of responses were received including DfI who suggested that it was not robust to include a 5 year housing supply in the calculation of housing need as set out in the POP. Therefore the Council reduced the housing allocation figure and redistributed growth across the settlements. Therefore the Council considers that it has considered reasonable alternatives in relation to Housing Growth. Information is set out in Topic Paper 1.</p> <p>The Council published a Preferred Options Paper Consultation Report which was made available at the same time as the DPS so that interested parties were furnished with a summary of the POP responses and how the Council took them into account in preparing the DPS. The DPS also contains information on how it was developed. The SA Report also contains information on how it was developed. Information is also provided on the guidance and legislation taken into account in its preparation.</p> <p>Appendix 4 of the SA Report sets out the reasoning for the policy scoring and the options considered. A legislative checklist is also published. The Council has also published a soundness compliance statement.</p> <p>A final SA Statement will be published once the Plan is adopted which will show how consultation has been taken into account. The LPP will be subject to SA appraisal.</p>
LA03/DPS/0111	TC Town Planning	DM 18 C	<p>TC Town Planning considers Policy DM 18C to be very restrictive and may compromise amenity where a gap site is only acceptable between a row of 5 buildings (not including ancillary buildings).</p> <p>Considers the policy contradictory, in that the gap site for up to 2 dwellings should not be more than 60m but at the same time should also respect the surrounding character and settlement pattern. Considers that this may not be achievable without offending one of the criterion.</p>	<p>No specified modification.</p>	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in text "Why we have this policy".</p>
LA03/DPS/0112	The Woodland Trust	DM 39	<p>The Woodland Trust refers to the Plan's omission of reference to the sub-category of PAWS (Plantations on Ancient Woodland Sites), and the Ancient Woodland Inventory.</p> <p>Considers that the protection of ancient woodland and long established woodland could be improved (with specific mention should be made of restoring PAWS).</p>	<p>The Woodland Trust suggest insertion of new lines between Policies DM 39.1 and 39.2 (or where Council feels most appropriate) - 'Damage to or loss of an irreplaceable habitat (such as ancient and long established woodland) will always result in net loss of biodiversity; no amount of compensation can achieve net gain. Therefore, the need for and/or benefits of development in such locations will have to be wholly exceptional. In such cases, as a last resort, compensatory measures will be secured to minimise net loss of biodiversity, but these measures will not be included in the assessment of benefits of the proposals.'</p> <p>The Woodland Trust also suggest a new paragraph/sentence in the appropriate section - 'We will commit to the restoration of plantations on ancient woodland sites.'</p>	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this Policy".</p> <p>Policy DM 39.1 already references ancient and long established woodland and introduces a presumption against development likely to result in an unacceptable adverse impact on such areas.</p> <p>The Council would point out that Policy DM 39 solely assesses the impact of development proposals on ancient and long established woodland. It is not considered appropriate for DM Policy to seek the restoration of plantations on ancient woodland sites as this is considered to be more a matter for direct intervention beyond the development management process.</p>
LA03/DPS/0112	The Woodland Trust	DM 42	<p>The Woodland Trust suggests the insertion of an additional paragraph relating to the protection of veteran trees.</p> <p>Considers more could be said within the DPS regarding the particular benefits of greater canopy cover, and increasing trees and the extent of woods.</p> <p>Regarding the technical aspects of planting new trees, The Woodland Trust suggest making reference to 'BS 8545:2014 'Trees: from nursery to independence in the landscape.'</p>	<p>Request additional paragraph to be added: 'For veteran trees, where a more precautionary sites approach is warranted, Root Protection Area (RPA) distances should be greater than the standard buffers stated in BS 5837:2012.</p> <p>The RPA should follow the guidance in 'Ancient and other veteran trees: further guidance on management' (Longsdale, D: 2013) and be a minimum of 15 times the diameter of the tree trunks or 5 metres beyond the canopy, whichever is the greater.'</p> <p>Suggest inserting a paragraph in the appropriate section: 'There is now a wealth of evidence on the many benefits of woodland, trees and high canopy cover, including improving: physical and mental health; air quality; water management (reducing flooding); soil quality; shading; cooling through evapotranspiration; as well as the more obvious benefit of improving biodiversity. The background research and evidence for this, along with guidance on the retention and planting of trees in the new development, can be found in the report 'Residential Development and Trees' (The Woodland Trust, 2019). https://www.woodlandtrust.org.uk/publications/2019/01/residential-developments-and-trees/.'</p>	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text, "Why we have this policy".</p> <p>Whilst the Council notes the additional paragraphs requested and the guidance outlined therein, it is considered that this matter would be more appropriately addressed through supplementary planning guidance.</p> <p>As the DPS indicates, the Council will in due course bring forward supplementary planning guidance where appropriate, and it is considered that future guidance relating to trees and development would be the appropriate document to include further information on veteran trees, as well as more general advice in relation to tree considerations.</p>

LA03/DPS/0112	The Woodland Trust	SP 10	The Woodland Trust sets out further detail on the importance of trees in relation to flood risk, air quality, urban heat islands, climate change and health. The Woodland Trust cites a range of publications to bolster the DPS sections on flood risk and increasing resilience to climate change.	Request for a range of text to be incorporated into policy wording (Flood Risk and Increasing resilience to climate change sections).	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text, "Why we have taken this approach". Whilst the Council acknowledges the importance of trees to matters such as flood risk, air quality, urban heat islands, climate change and health, as outlined by the Woodland Trust, it nevertheless considers the amount of detail suggested would be inappropriate for inclusion within the DPS text. It is considered that this matter would be more appropriately addressed through supplementary planning guidance. As the DPS indicates, the Council will in due course bring forward supplementary planning guidance where appropriate, which may include further information on the importance of trees in relation to flood risk and in tackling climate change.
LA03/DPS/0113	ABO Wind NI Ltd	Plan Vision	ABO Wind NI Ltd welcome the Council's commitment to provide sustainable development that 'will address the ongoing challenges of climate change' and that the area will be 'a place with a sustainable future'. Through these objectives, they welcome the Council's commitment to sustainable growth, innovation, economic diversification, responsible use of natural resources and adaption to and mitigate climate change.	No specified modification.	Support noted and welcomed.
LA03/DPS/0113	ABO Wind NI Ltd	Strategic Objectives	ABO Wind NI Ltd support Strategic Objectives 1 - 3.	No specified modification.	Support noted and welcomed.
LA03/DPS/0113	ABO Wind NI Ltd	Strategic Objectives	ABO Wind NI Ltd support Strategic Objective 7.	No specified modification.	Support noted and welcomed.
LA03/DPS/0113	ABO Wind NI Ltd	Strategic Objectives	ABO Wind NI Ltd support Strategic Objective 11.	No specified modification.	Support noted and welcomed.
LA03/DPS/0113	ABO Wind NI Ltd	Strategic Objectives	ABO Wind NI Ltd support Strategic Objective 12.	No specified modification.	Support noted and welcomed.
LA03/DPS/0113	ABO Wind NI Ltd	DM 45	ABO Wind NI Ltd notes the Spatial Framework for Wind Energy Development as set out in Policy DM 45.5, Group 2 identifies a 1km buffer, however considers that there is no commentary or supporting evidence to explain or justify this.	No specified modification.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". The evidence in support of the Spatial Framework for Wind Energy, set out in Policy DM 45.5 is provided in Evidence Paper 13: Renewables. This advises that "The use of natural resources as a source of renewable energy can cause adverse impacts if not developed and managed sustainably. These impacts can be on the amenity and wellbeing of people living and working in proximity to the development, as well as on the very environment that is supplying the resource." In bringing forward the Spatial Framework it highlights that particular consideration and protection should be provided to certain areas including, proposals that would impact on the setting of a settlement. A 1km buffer for settlements is indicated as appropriate for this purpose. Importantly the Spatial Framework does not rule out wind energy proposals in these areas, rather it advises that proposal will generally only be appropriate in circumstances where any significant effects on the amenity and qualities of these areas can be substantially overcome by siting, design and other forms of mitigation.
LA03/DPS/0113	ABO Wind NI Ltd	DM 45	ABO Wind NI Ltd considers the wording of Policy DM 45.7 is too restrictive and should be revised.	Policy DM 45.7 should be revised to state, "In assessing the landscape impacts of proposals the Council will take account of the guidance set out in the document 'Wind Energy - Development in NI's Landscapes' or other more up to date publication(s) will be taken into account in assessing all wind turbine proposals".	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Should further guidance on the landscape impact of wind energy development become available during the life of the Plan, this would be a material consideration to be taken account of by the Council through the normal Development Management process.

LA03/DPS/0114	Paul Rea (Robert Logan Architects)	SP 4	<p>Mr. Rea acknowledges the overall reduction in the housing growth allocation for the Borough, but considers the current allocation between villages is now inconsistent.</p> <p>Compares Straid with Ballyrobert and considers the allocation to Straid has been unreasonably reduced by over 80% while Ballyrobert has only been reduced by 56%, despite both settlements having similar characteristics as set out in Evidence Paper 2: Housing. Identifies that the lack of uncommitted land in Straid is evidence of the pressure for housing.</p> <p>Considers settlements with lower development pressure should be reduced in terms of allocation to allow for more appropriate allocations to settlements such as Straid, where there has clearly been and continues to be a demand for new housing.</p> <p>Supporting letter provided in submission from a local housing agent highlighting the need for new housing and general market trends.</p>	The housing growth allocation to Straid should be increased from 5 units to a more appropriate allocation. The POP allocation of 25 units is indicated as broadly in line with the objector's expectation.	<p>No change required. It is considered that the 5 unit housing allocation proposed for Straid is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Straid. It is considered that an increase in the overall housing allocation to Straid would be at odds with the considerations identified above.</p> <p>Following publication of and consultation on the POP the Council reconsidered its overall housing growth allocation across the Borough which resulted in a 25% reduction. As a consequence it was also necessary to reduce the growth allocation across settlements. Council considered a number of options and agreed to reduce the proportion of growth to all settlements whilst allocating a higher proportion of the allocation to Metropolitan Newtownabbey and Antrim as the major settlements with the remaining allocation reflecting the current size and role of the other towns, villages and smaller settlements.</p> <p>The DPS's evidence base for the housing allocation to Straid is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0114	Paul Rea (Robert Logan Architects)	Site Specific	<p>Mr. Rea considers the principle of retaining undeveloped land within the settlements is flawed, in so much as the undeveloped land, it must be assumed, exists only due to lack of development pressure.</p> <p>A more robust and proper ordering should focus on the qualitative analysis and if necessary areas of lower development pressure should be reduced.</p>	No specified modification.	No change required. It is considered that this is a site-specific issue which will be dealt with as part of the forthcoming Local Policies Plan. A strategic review of the 2018 housing land supply within settlements, was presented within Evidence Paper 6: Housing and updated within Topic Paper 1: Housing Growth. A full and detailed analysis of housing land supply and deliverability will be undertaken as part of the forthcoming Local Policies Plan, which will inform the zoning of housing land in order to meet the housing allocation, identified within the adopted Plan Strategy.
LA03/DPS/0114	Paul Rea (Robert Logan Architects)	Site Specific	Mr. Rea requests subject lands be considered for housing development: Straid	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0115	Karl Property Investments	SP 7	Karl Property Investments support Policy DM 35, whilst suggesting that the protection and refurbishment of a heritage asset, particularly if its listed, should be considered sufficient public benefit to outweigh the departure from normal planning policy.	Requests a more robust definition of 'Public Benefit' and whether it can be objectively measured.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy".</p> <p>The Council considers that the assessment of the public benefit associated with an application for enabling development is a matter best assessed through the normal Development Management process.</p>
LA03/DPS/0116	D R Mitchell	DM 17	D R Mitchell Ltd raise concerns regarding the Affordable Housing policy set out under Policy DM 17.3. Indicate that the report prepared on Developer Contributions for Affordable Housing in Northern Ireland undertaken by the Three Dragons and Heriot-Watt University concluded that, with a few localised exceptions, the private development sector could not gift or make a social housing contribution. Whilst acknowledging that the Council policy introduces a lower threshold for such contributions, the objection queries what has changed in the interim.	The policy should demonstrate associated cost implications and how these can be borne without being detrimental to housing supply in the private sector.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy on affordable housing provided in the text para. 7.20 to 7.24.</p> <p>Further information on the cost implications of the delivery of affordable housing units is available from NIHE and Housing Associations and it should also be noted that the delivery of affordable housing units by private developers will be subject to subsidy in line with current funding levels. As identified under para. 7.38 the Council intends to bring forward supplementary planning guidance to explain in greater detail how affordable housing provision will be implemented in practice.</p> <p>The Council has now published Topic Paper 2: Affordable Housing which further clarifies its position on affordable housing. This document should be read for further information.</p>
LA03/DPS/0117	Karl Property Investments Ltd	DM 1 / DM 2	Karl Property Investments Ltd request that subject lands at Karl Business Park be considered for the wider development of an SEL or incorporation as part of the BIA SEL.	Include Karl Business Park as an SEL or within the BIA SEL.	<p>No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account the provisions of the RDS and SPPS. The rationale for the strategic policy is provided by the text "Why we have taken this approach".</p> <p>The primary focus for SELs is within the urban area. With regard to the rural area, the DPS identifies only two SELs and this is due to their existing strategic significance. The Council acknowledges the importance of existing smaller scale rural employment sites, however they do not demonstrate this strategic role and will therefore not be identified as SELs. Their future development will be considered under Policy DM 2 Economic Development - Countryside.</p> <p>Further information on SELs is contained within Evidence Paper 3 : Economic Growth.</p> <p>The boundaries of SELs will be brought forward at the Local Policies Plan stage of the process, which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p>

LA03/DPS/0117	Karl Property Investments Ltd	SP 2	Karl Property Investments Ltd refers to Policy DM 13 - BIA Operations; but objection seems to relate more to Policy SP 2.8 - BIA SEL. Considers that BIA should not be allowed to expand without first giving consideration as to whether existing commercial premises within the vicinity can support such uses.	No specified modification but requests that consideration be given to existing commercial sites/properties within the vicinity of BIA.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS . The rationale for the strategic policy is provided in the text "Why we have taken this approach". Similarly the rationale for the DM policy is provided in the text "Why we have this policy". The boundaries of SELs will be brought forward at the Local Policies Plan stage of the process, which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0117	Karl Property Investments Ltd	SP 4	Karl Property Investments Ltd state that POP comments are still relevant in relation to Policy SP 4. Considers POP option 3 is more appropriate as the additional allocation is necessary due to the ambitious growth plans of neighbouring BCC, and many settlements within Antrim and Newtownabbey act as commuter towns for Belfast.	Housing growth figure should be amended to 14,960 units and the housing allocation be updated to reflect the uplifted figure.	No change required. The Council has identified what it considers to be an appropriate and reasonable housing growth figure of 9,750 units for the Borough between 2015 and 2030. It has taken into consideration a range of relevant information, including the published HGI for the Borough, the DfI response to the POP regarding 5 year housing supply and has considered reasonable alternatives, as demonstrated in our published evidence papers and assessments, as well as Topic Paper 1: Housing Growth. Whilst reliance for an uplift in the Borough's housing growth figure in this representation is made on the need for the Plan to accommodate the growth plans set out in the Belfast City Council Plan Strategy (BCCPS), it is noted that this remains at draft stage and furthermore that the BCCPS seeks in any case to accommodate the bulk of its growth needs within the City Council area.
LA03/DPS/0117	Karl Property Investments Ltd	DM 17	Karl Property Investments Ltd queries whether Policy DM 17.3 should only be considered where there is a recognised need from the NIHE.	No specified modification.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Policy DM 17.3 will assist in meeting the affordable housing needs identified across the Borough and it is considered that the policy threshold in relation to Affordable Housing is appropriate and reasonable and that in order to provide certainty for all parties, the policy should be applied consistently, with the expectation that all proposals of 40 units or greater will be required to deliver affordable units. The Council has now published Topic Paper 2: Affordable Housing which clarifies its position on affordable housing. This document should be read for further information.
LA03/DPS/0117	Karl Property Investments Ltd	Site Specific	Karl Property Investments Ltd request that subject lands be considered for housing development: Antrim	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0118	PUDSI	SP 2	PUDSI considers that Policy SP 2.8 permits 'business' and 'other complementary employment and service uses' at the proposed Belfast International Airport Strategic Employment Location. Considers that this would allow uses that should normally be directed to a town centre or a mixed-use service centre location.	Policy should be reworded to restrict typical town centre uses at the proposed Belfast International Airport Strategic Employment Location.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale of the strategic policy is provided in the text "Why we have taken this approach". Belfast International Airport is identified as Northern Ireland's largest airport and a Gateway in the RDS. It is also strategically located near the Regional Strategic Transport Network and is one of the Borough's largest employers. Therefore, the DPS seeks to strengthen its role as a Regional Gateway and has identified it as a Strategic Employment Location. Given its strategic importance to the Borough and indeed Northern Ireland, the Council considers it reasonable for the DPS to support a wide range of employment uses, including continuing business use, at this location. The Council would however point out that any retail development proposed will be required to fulfil the relevant retail policy provisions of the DPS which incorporate the town centre first approach. Proposals will be considered on their individual merits through the Development Management process and taking account of the policies in the Local Development Plan. All policies within the LDP should be read together. This is made clear in SP 1, Positive Planning Note on page 11 and para 1.5.
LA03/DPS/0118	PUDSI	SP 2	PUDSI considers that the sub-title of Policy SP 2.12 should be 'Town Centre Uses (Including Retail)' to make it explicitly clear that that it applies to all town centre uses. Considers the term 'retail centres' is misleading.	Amend Policy title to: 'Town Centre Uses (Including Retail)'. Within policy, replace term 'retail centres' with 'mixed-use centres'.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach". The Council's use of the terminology 'Town Centres and Retailing' in the Plan is consistent with that as defined in the SPPS (pages 101-105). Furthermore, the Council's use of the terminology 'Retail Centres' in the Plan is consistent with the SPPS which refers to "...retail and main town centre uses" (para 6.271, page 101).
LA03/DPS/0118	PUDSI	SP 2	PUDSI considers that the proposed Global Point Strategic Employment Location and land to the north (on the opposite side of the railway line) offer one of the most accessible locations in Northern Ireland being adjacent to a key transport corridor, and having excellent public transport and active travel connections. Additionally the site is in close proximity to key civic and recreational uses including Mossley Mill and Ballyearl Golf and Leisure Centre. An opportunity exists here for high density, mixed use development that will take advantage of these local characteristics.	Lands at Global Point between the Three Mile Water and the railway track, plus the land between the Ballyearl Golf and Leisure Centre and the railway should be defined as a mixed use service centre (possibly a town or district centre) and should be the focus of high density urban development including offices (already permitted at Global Point).	No change required. The Council considers the policy as drafted to be appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the Strategic Policy is provided in the text. 'Why we have taken this approach'. Indicative centres are clearly set out in the proposed Retail Hierarchy of the DPS (table 4, page 79). Further information on the identification of centres within the retail hierarchy is included within Evidence Paper 4: Retail and Commercial Leisure Study, with particular reference to para. 6.21 to 6.23 in relation to the matter raised.

LA03/DPS/0118	PUDSI	DM 1	PUDSI considers that Policy DM 1 would allow town centre uses such as offices and call centres in Strategic Employment Locations and other zoned employment sites. Considers that such uses should be directed to town centres and smaller mixed-use service centres.	Policy DM 1 should explicitly indicate that town centres are an appropriate and preferred location for office and call centre development.	No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Policy SP 2.12 clearly states, "The Council will operate a town centre first approach in considering the development of retail and other main town centre uses across our Borough". All policies within the LDP should be read together. This is made clear in SP 1, Positive Planning Note on page 11 and para 1.5.
LA03/DPS/0118	PUDSI	DM 7	PUDSI considers that the proposed wording within Policies DM 7.1 & DM 7.2 which state "that generate significant footfall", lacks clarity and is open to interpretation. Considers that there are uses that do not generate significant footfall but should still be directed to locations in town centres and other mixed use service centres.	Delete words "that generate significant footfall".	Open to minor change. The Council is suggesting the following minor changes in response to the representation as it is recognised that not all town centre uses may generate significant footfall and accordingly the deletion suggested is for the purposes of clarifying this matter. Footfall is only but one of a range of indicators commonly used as part of a Town Centre health check (as defined in page 104, para 6.285 of the SPPS). Suggested minor change at DM 7.1, page 100, Deletion of the words "that generate significant footfall such as commercial leisure uses". Suggested minor change at DM 7.2, page 100, Deletion of the words "that generate significant footfall".
LA03/DPS/0118	PUDSI	DM 8	PUDSI considers that Policy DM 8.2 is not explicit enough to restrict development of the full range of uses that should be directed to Antrim Town Centre.	Suggested list of restricted uses as follows: (d) Proposals for office or call centre use; (e) Proposals for food and drink uses; (f) Proposals for commercial leisure uses; (g) Proposals for community and cultural uses including for the display of works of art, as a museum, as a public library or reading room, as a public hall or exhibition hall; and (h) Proposals for assembly and leisure uses including use as a bingo hall, cinema, concert hall, dance hall or theatre.	No change required. The Council considers that the policy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the policy is provided in the text "Why we have this Policy". Proposals will be considered on their individual merits through the normal Development Management process and taking account of the policies in the Local Development Plan and other material considerations. Furthermore, Evidence Paper 4: Retail and Commercial Leisure Study informs the LDP. The study and LDP identifies a new Retail Hierarchy which best represents and secures the retail sector across the Borough. This document should be read for further information.
LA03/DPS/0118	PUDSI	SP 2	PUDSI considers that it is unclear what status the proposed draft centre boundaries as defined in Appendix F of Evidence Paper 4 have. The proposed draft town centre boundaries are too restrictive and do not allow for the full realisation of potential development opportunities in some locations and particularly in Antrim. PUDSI considers the lack of new defined town centre boundaries at Plan Strategy stage has the potential to limit town centre first development and will delay the proper implementation of the relevant policies.	Town centre boundaries should be defined at Plan Strategy stage and should be more generous than those indicated in Evidence Paper 4: Retail and Commercial Leisure (Refers the Council to maps submitted with the representation identifying proposed boundary changes for Antrim Town Centre, Abbey Centre Large Town Centre, Ballyclare Town Centre, and Glengormley Town Centres).	The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality, this includes Evidence Paper 4: Retail and Commercial Leisure as well as the "Introduction" and "Why we have taken this approach" for Strategic Policy 2. The Council considers that the comments raised have no impact on the soundness of the Draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage. Paragraph 1.16 of the DPS clearly states, "Until such times as the Council's Local Policies Plan identifies the boundaries of settlement limits, local designations and zonings, the provisions of the current legacy plans will continue to apply in the decision making process". Evidence Paper 4 : Retail and Commercial Leisure Study informs the LDP. The study and LDP identifies a new Retail Hierarchy which best represents and secures the retail sector across the Borough. Furthermore, indicative centre boundary amendments to those already designated in extant Area Plans are set out in Evidence Paper: 4, Appendix F. The study clearly states, "These plans are purely for illustrative purpose and will be reviewed in detail by the Forward Plan Team in due course". Accordingly, due to the site-specific nature of this issue, this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0119	John Mulholland Motors (Donaldson Planning)	SP 1	John Mulholland Motors (JMM) considers that Policy SP 1.6 (c) is unduly restrictive in the use of terminology such as "consolidation" rather than the "strengthen" and "growth" emphasis for the larger towns. Considers that this indicates that Randalstown will not be afforded an opportunity to accommodate firm economic development opportunities.	Policy SP 1.6 (c) - Spatial Growth Strategy revised to "support, strengthen and grow in the view of economic opportunities offered by major employers in the town such as John Mulholland Motors."	No change required. The Council considers that the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS . The rationale for the strategic policy is provided in the text "Why we have taken this approach". The policies of the plan should be read together. This is made clear in Policy SP 1, Positive Planning Note on page 11 and para 1.5. Section 5 Employment of the DPS sets out a range of policies to facilitate economic growth in settlements. Evidence Paper 2: Settlement Evaluation sets out supporting information in relation to the identification of the Spatial Growth Strategy, whilst Evidence Paper 3: Economic Development sets out supporting information in relation to economic development.
LA03/DPS/0119	John Mulholland Motors (Donaldson)	DM 1	JMM considers that policy objective RG 1 of the RDS, which seeks to ensure an adequate supply of land to facilitate sustainable economic growth, has not been met in Randalstown. Insufficient provision is made for growth of a local major employer, JMM. Considers that employment growth at this key node close to the M22 is critical for the retention of JM Motors who continue to grow at a significant rate.	Policy SP 1.6 (c) - Spatial Growth Strategy revised to "support, strengthen and grow in the view of economic opportunities offered by major employers in the town such as John Mulholland Motors."	No change required. The Council considers that the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS . The rationale for the strategic policy is provided in the text "Why we have taken this approach". Evidence Paper 2: Settlement Evaluation sets out supporting information in relation to the identification of the Spatial Growth Strategy, whilst Evidence Paper 3: Economic Growth sets out supporting information in relation to economic development matters. The Council considers that assessment of proposals for extensions to existing commercial premises will be considered under the normal Development Management process taking account of the policy provisions of the DPS, relevant guidance and other material considerations.
LA03/DPS/0119	John Mulholland Motors (Donaldson Planning)	Evidence Paper 2: Settlement Evaluation	JMM considers that Evidence Paper 2: Settlement Evaluation makes no reference to the evident constraints at this important entrance to Randalstown where the car sales operations by JMM frequently exceeds the physical site boundaries into the surrounding area. Instead page 58 of Evidence Paper 2 simply acknowledges that land for employment uses in Randalstown is 'limited'.	No specified modification.	The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality, this includes Evidence Paper 2: Settlement Evaluation. The Council considers that the comments raised have no impact on the soundness of the draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage. Evidence Paper 2: Settlement Evaluation contains a strategic assessment of each settlement. Any site specific issues will be considered at LPP stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.

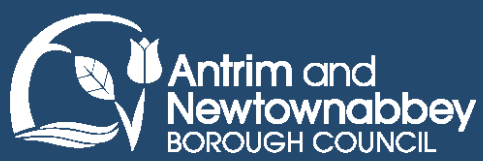
LA03/DPS/0120	CHL (WPB)	SP 4	<p>CHL raise an objection which highlights the need for an increased levels of housing growth allocation to Crumlin.</p> <p>The increased allocation is suggested to:</p> <p>(a) maximise Crumlin's future potential for sustainable growth based on the RDS Housing Evaluation Framework;</p> <p>(b) take account of the need identified in the HNA/Housing Market Analysis;</p> <p>(c) maintain the role of Crumlin; and</p> <p>(d) to give a degree of flexibility over the choice of sites.</p> <p>Accordingly the housing allocation proposed in the DPS does not appear as a coherent strategy of policies and allocations that logically flow from a robust evidence base.</p>	<p>That the housing allocation to Crumlin should be increased from 350 units to 500 units.</p>	<p>No change required. It is considered that the 350 unit housing allocation proposed for Crumlin is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework and the role and function of Crumlin. It is considered that an increase in the overall housing allocation to Crumlin would be at odds with the considerations identified above.</p> <p>The DPS's evidence for the housing allocation to Crumlin is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0120	CHL (WPB)	Site Specific	CHL request that subject lands be considered for housing development: Crumlin.	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.
LA03/DPS/0121	McHenry Brothers (Ireland) Ltd (MKA Planning)	SP 1	McHenry Brothers supports the designation of Dunadry as a village within the settlement hierarchy.	No specified modification.	Support noted and welcomed.
LA03/DPS/0121	McHenry Brothers (Ireland) Ltd (MKA Planning)	SP 1	McHenry Brothers suggest the text relating to villages under Policy SP 1.6 (d) of the Spatial Growth Strategy should reflect the text set out for villages in the POP regarding accessibility.	<p>Add the following text to Policy SP 1.6 (d) - Spatial Growth Strategy:</p> <p>"...of an appropriate scale and character to individual settlements taking account of the benefits of accessibility to our key transport routes".</p>	<p>No change required. The Council considers that the Spatial Growth Strategy as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>Following publication of and consultation on the POP, the Council reconsidered its overall housing growth allocation across the Borough which resulted in a 25% reduction. As a consequence it was also necessary to reduce the housing growth allocation across settlements. Council considered a number of options and agreed to reduce the proportion of growth to all settlements whilst allocating a higher proportion to Metropolitan Newtownabbey and Antrim as the major settlements with the remaining allocation reflecting the current size and role of the other towns, villages and smaller settlements.</p> <p>The Council has now published Topic Paper 1: Housing Growth which further clarifies its position on housing growth and allocation.</p>
LA03/DPS/0121	McHenry Brothers (Ireland) Ltd (MKA Planning)	SP 2	McHenry Brothers suggest consideration should be given to the designation of a local centre for the village of Dunadry.	Include Dunadry in the list of local centres.	<p>No change required. The Council considers the policy as drafted is appropriate and reasonable and has taken into account the provisions of the RDS and SPPS. The rationale for the strategic policy is provided in the text "Why we have taken this approach".</p> <p>The villages identified with a Local Centre (Ballynure, Doagh, Parkgate, Templepatrick and Toome) currently exhibit a level of local service provision that merit the designation of a Local Centre. Evidence Paper 4: Retail and Commercial Leisure Study sets out supporting information for the identification of centres across that Borough.</p> <p>The Council considers that Policy DM 7 makes adequate provision for retail development in those villages where no Local Centre is defined.</p>
LA03/DPS/0121	McHenry Bros (Ireland) Ltd (MKA Planning)	SP 4	<p>McHenry Brothers object to the 83% reduction in housing allocation to Dunadry between POP and DPS. Considers that the allocation:</p> <p>(a) is unrealistic and inappropriate and has not been founded on robust evidence;</p> <p>(b) does not provide reasonable flexibility to deal with changing circumstances; and</p> <p>(c) does not take account of the direction of the RDS and PPS policies in support of new housing near key transport routes and close to SELs.</p>	The housing growth allocation to Dunadry should be increased from 10 units to 60 units.	<p>No change required. It is considered that the 10 unit housing allocation proposed for Dunadry is appropriate and reasonable in light of the housing growth figure for the Borough, the Spatial Growth Strategy, the RDS Broad Housing Evaluation Framework, the DfI response to the POP regarding the 5 year housing supply and the role and function of Dunadry. It is considered that an increase in the overall housing allocation to Dunadry would be at odds with the considerations identified above.</p> <p>Following publication of and consultation on the POP the Council reconsidered its overall housing growth allocation across the Borough which resulted in a 25% reduction. As a consequence it was also necessary to reduce the housing growth allocation across settlements. Council considered a number of options and agreed to reduce the proportion of growth to all settlements whilst allocating a higher proportion of the allocation to Metropolitan Newtownabbey and Antrim as the major settlements with the remaining allocation reflecting the current size and role of the other towns, villages and smaller settlements.</p> <p>The DPS's evidence base for the housing allocation to Dunadry is set out in Evidence Paper 2: Settlement Evaluation and Evidence Paper 6: Housing. The Council has also published Topic Paper 1: Housing Growth. These documents should be read for further information.</p>
LA03/DPS/0121	McHenry Brothers (Ireland) Ltd (MKA Planning)	Evidence Paper 2: Settlement Evaluation	McHenry Brothers consider that Evidence Paper 2: Settlement Evaluation is unsound and is not a robust evidence base because of potential development constraints. i.e. flooding.	No specified modification.	<p>The Council considers that there is sufficient evidence when the plan and all its evidence base is read in totality, this includes Evidence Paper 2: Settlement Evaluation. The Council considers that the comments raised have no impact on the soundness of the draft Plan Strategy document and rather they seek minor textual changes and updating to one of the accompanying evidence papers. The Council will give consideration to the need to include this information as evidence at the Local Policies Plan stage.</p> <p>Evidence Paper 2: Settlement Evaluation contains a strategic assessment of each settlement. Any site specific issues will be considered at LPP stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.</p>

LA03/DPS/0121	McHenry Brothers (Ireland) Ltd (MKA Planning)	SA	<p>McHenry Brothers consider that in relation to Policy SP 4: Homes (Housing Allocation), the SA offers no explanation for the reduction in housing growth allocation to Dunadry.</p> <p>The SA consistently states that 'a variety of household types and sizes' should be available. However, it fails to acknowledge the difficulties villages such as Dunadry with an allocation of only 10 units will face in trying to provide this variety.</p>	No specified modification.	<p>The Council notes Henry Bros comments in relation to the SA Report.</p> <p>The SA Report sets out alternatives for the strategic allocation of housing. It would not be proportionate to appraise the allocation for each individual settlement. The Council's POP Consultation Report sets out a summary of the responses received including DfI's comment that a five year housing supply should not be included in the POP's housing growth figure. Therefore the DPS sets out a reduced housing growth figure. Information is set out in Topic Paper 1.</p>
LA03/DPS/0122	Mr Jackson (David W Wilson)	Site Specific	Mr. Jackson requests subject lands be considered for mixed use development: Metropolitan Newtownabbey	Inclusion/zoning of land for development.	Due to the site specific nature of this issue this is a matter to be dealt with at the Local Policies Plan stage which will consider settlement limits, site specific designations/boundaries and the zoning of land.

Annex A

Suggested Minor Change: Revised Table for Antrim and Newtownabbey Retail Hierarchy. SP 2, Table 4, page 79.

Tier	Title	Role and Function	Centres
1	Large Town Centres	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a significant hinterland which includes smaller neighbouring towns or a number of suburbs.	Abbey Centre and Antrim
2	Town Centres	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a hinterland which includes neighbouring villages or a few surrounding suburbs.	Ballyclare, Crumlin, Glengormley, and Randalstown
3	District Centres	Provides (or has the potential to provide) a range of shops, services, businesses and community facilities to a suburban community.	Northcott and Whiteabbey Village
4	Local Centres	Provides (or has the potential to provide) a range of shops and services to a surrounding community.	<p>Urban</p> <p><u>Metropolitan Newtownabbey</u></p> <p>Abbot's Cross, Ballyduff, Beverley Road, Carnmoney, Cloughfern, The Diamond (Rathcoole), Jennings Park, Kingspark/Kings Crescent, Mallusk, Mayfield, Merville Garden Village, Monkstown, Mossley West and Richmond.</p> <p><u>Antrim</u></p> <p>Greystone and Parkhall</p> <p>Rural</p> <p>Ballynure, Doagh, Parkgate, Templepatrick, and Toome</p>



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Antrim Antrim Civic Centre
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Antrim,
BT41 2UB

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