

Local Development Plan | 2030

Draft Plan Strategy

Draft Plan Strategy
Public Consultation Report

March 2021

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Executive Summary

This Draft Plan Strategy Public Consultation Report summarises the public participation process that was undertaken in relation to the Council's Local Development Plan (LDP), Draft Plan Strategy (DPS) (together with its Evidence Papers and associated Assessments) in accordance with the Council's LDP Statement of Community Involvement (SCI), and the Planning (Local Development Plan) Regulations (NI) 2015.

This report provides a high level summary of the key issues raised through the DPS consultation process undertaken between 26 July 2019 to 20 September 2019 (for representations) and 11 October 2019 to 6 December 2019 (for counter representations), an indication of the Council's view in relation to them, and other information the Council considers relevant at this stage.

The Council received 122 written representations at the DPS stage ranging from succinct letters to detailed technical documents to include: 13 responses from individual members of the public, 46 responses from organisations including statutory consultees, and 63 responses from planning agents.

Whilst the Council received 26 written counter representations, the Council considers such representations may not meet the requirements of The Local Development Plan (NI) Regulations 2015 as they raise new issues. Accordingly, it is the view of the Council that none of the 26 submissions are matters to be considered at the DPS stage.

This Report is also accompanied by a number of documents that should be read alongside. These include: (1) Representations by Issue Report, (2) Representations by Respondent Report, (3) Counter Representations Report, (4) Topic Paper 1 Housing Growth, and (5) Topic Paper 2 Affordable Housing.

This Report responds to established best practice guidance as set out in the Department for Infrastructure's Development Plan Practice Note 9, 'Submission of Handling of Representations' and the published PAC guidance, 'Procedures for Independent Examination of Local Development Plans V2 2019'.

Whilst respondents were encouraged to respond using a response form, a large proportion of respondents did not use this. Planning officers have therefore made an assessment and summarised the issue under what is considered to be the most relevant section of the Plan and other documentation. The structure of this report replicates that of the DPS main document (pages 12-13).

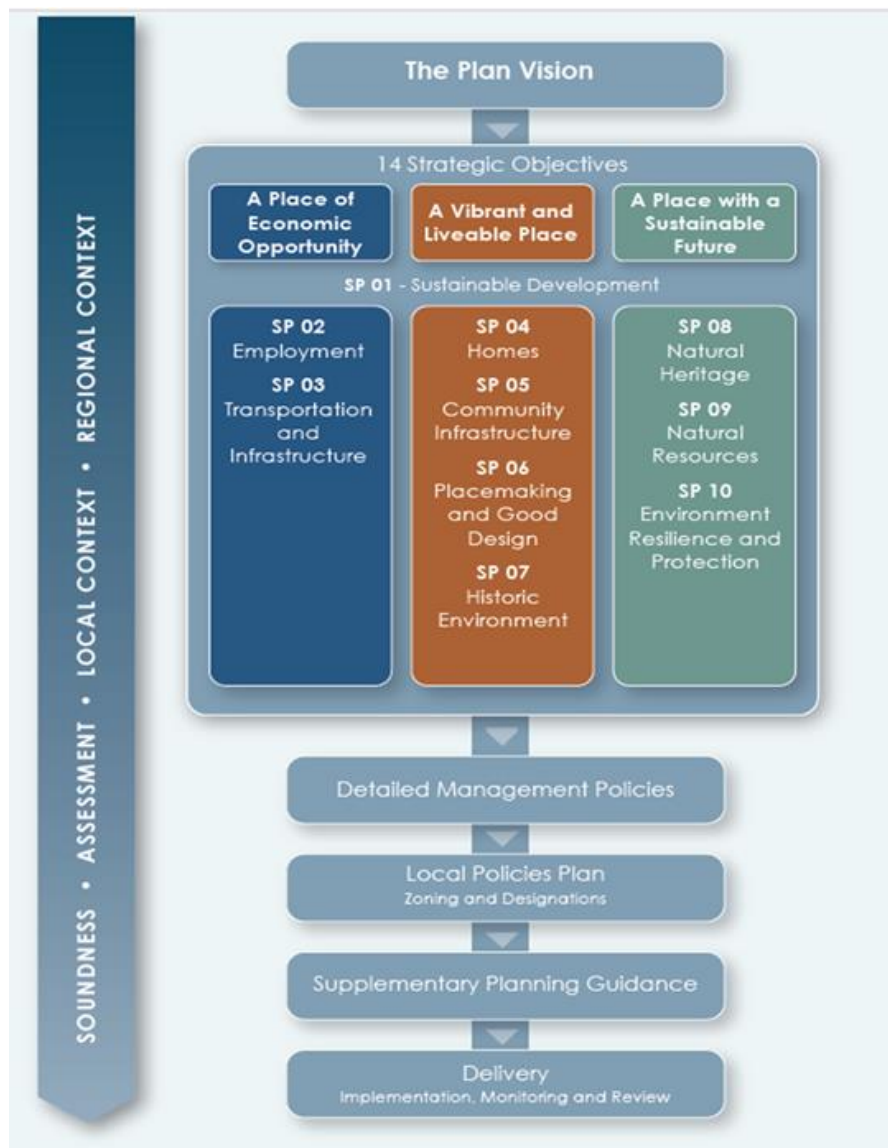
A list of typographical errors identified in the DPS and a list of the Council's suggested minor changes to the DPS are also included.

1 The Draft Plan Strategy Consultation

- 1.1 The Council published its Draft Plan Strategy (DPS) for publication consultation in July 2019. A four-week period of pre-consultation ran from 28 June 2019 to 25 July 2019. This was to allow everyone the time to read and understand the DPS and all its associated documents.
- 1.2 The formal 8-week period of public consultation ran for 8 weeks beginning on 26 July 2019 and ending on 20 September 2019. The DPS was published alongside a range of assessments which were also open for public consultation including a Sustainability Appraisal (incorporating a Strategic Environmental Assessment) and its supporting documents, a draft Habitats Regulations Assessment and an Equality (Section 75) Screening and Rural Needs Impact Assessment Report. The DPS was also accompanied by 21 Evidence Papers which informed the preparation of the document.
- 1.3 The counter representation stage ran for from 11 October 2019 to 6 December 2019.

What is the Local Development Plan?

- 1.4 The Draft Plan Strategy is one of two development Plan documents which, when read together will comprise the Local Development Plan (LDP) for the Borough. The second document is the Local Policies Plan (LPP) and this will be brought forward by the Council once the Plan Strategy has been adopted.
- 1.5 The LDP is a spatial land use Plan which is primarily about place. It will guide future development and use of land in our towns, villages, hamlets, and rural areas by addressing the spatial implications of social, economic, and environmental change. It is therefore a powerful tool for place-shaping.
- 1.6 The purpose of the LDP is to inform the public, statutory authorities, developers, and other interested parties of how our Borough should develop in the years ahead. It will balance competing demands and aims to ensure that appropriate development occurs in the right place at the right time. The policies and proposals of the LDP will be used to determine planning applications. A good LDP will lead to decisions that are consistent and people will know what to expect in terms of change, and the locations where development will be encouraged.

Figure 1: The Plan Preparation Process**What is this Report?**

- 1.7 Following public consultation and consideration of all representations and counter representations to the DPS Consultation, under Section 10 of The Planning Act (Northern Ireland) 2011, the Council is required to submit the Plan and its documentation to the Department of Infrastructure (DfI) to cause an Independent Examination. Under Regulation 20 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 the Council is required to submit a number of documents including a statement setting out if all responses were made in accordance with legislative provisions; the number of representations and a summary of the main issues raised in those representations.

- 1.8 This document sets out that statement, along with other information the Council considers relevant at this stage. A summary of how this Report is structured is set out below:

Section 1: Includes a statement on the representations and counter representations received.

Section 2: Provides a *summary* of representations to the DPS and accompanying evidence papers and the Council's response.

Section 3: Provides a *summary* of representations to the DPS Assessments (Sustainability Appraisal incorporating Strategic Environmental Assessment (including its Scoping Report and Non-Technical Summary), the draft Habitats Regulation Assessment and the Equality (Section 75) Screening and Rural Needs Impact Assessment Report) and the Council's response.

Section 4: Provides a *summary* of the submissions made at the counter representation stage of the public consultation and the Council's response.

Section 5: Provides a *summary* of miscellaneous issues raised during the DPS public consultation and the Council's response.

Section 6: List of typographical errors identified in the Plan.

Section 7: Suggested Minor Changes to the Plan.

- 1.9 This Report is also accompanied by a number of documents that should be read alongside it as set out below:-

Representations by Issue Report (DPS-S-002) – this sets out in a tabular format further detail on the issues raised by all respondents at the DPS stage by order of the Plan and accompanying documentation. This includes a summary of all the main issues raised under each area of the DPS/documentation, all relevant representations reference numbers, name of respondent and Council's position on the DPS main issues.

Representations by Respondent Report (DPS-S-003) – this 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 on that respondent's main issues.

Counter-Representations Report (DPS-S-004) – this sets out in a tabular format further detail on the main issues raised under each counter representation, name of respondent and the Council's position on the matters raised.

- 1.10 The accompanying documents also include the following two Topic Papers which provide further details in response to issues raised during the public consultation.

Topic Paper 1: Housing Growth (DPS-S-005) – Following the publication of the Council's DPS in June for public consultation, DfI made a representation, part of which advised the Council to take account of the forthcoming revised Housing Growth Indicators (HGIs). This Topic Paper gives the Council's position on the Revised Housing Growth Indicators 2016-2030 (Published September 2019 by DfI), as well as an update on housing baseline information including build rates, housing supply and the status of zoned land.

Topic Paper 2: Affordable Housing (DPS-S-006) – This Topic Paper sets out the background in relation to the issue of 'Affordable Housing' within the Borough, as well as stating the position of the Council following the receipt of responses to the DPS.

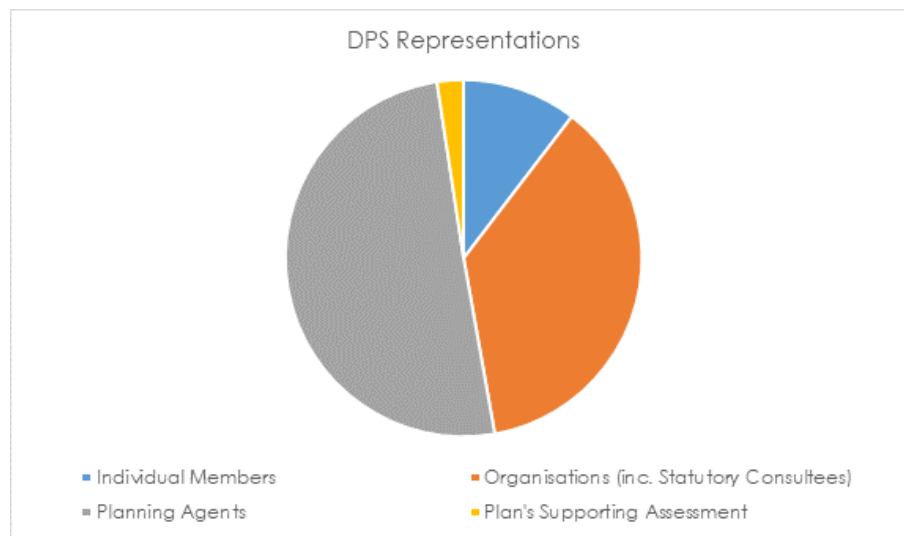
- 1.11 All documentation is available to view on the Council's website at www.antrimandnewtownabbey.gov.uk or can be viewed at Council offices **by appointment only**. Please contact the Planning Section via email planning@antrimandnewtownabbey.gov.uk or by telephone on 0300 123 6677 to arrange. Hard copies can be made available upon request. Please note that there may be charge for this service.

General approach to summarising representations

- 1.12 In order to assist with determining the responses made, the Council used best practice guidance as set out in the DfI's Development Plan Practice Note 9, 'Submission of Handling of Representations' and the published Planning Appeals Commission (PAC) guidance, 'Procedures for Independent Examination of Local Development Plans V2 2019'. Respondents were encouraged to respond using a response form which would enable the Council to identify the relevant section of the Plan the respondents were replying to and which of the 12 tests of soundness were applicable.
- 1.13 However, a large proportion of respondents did not use the recommended form and therefore the Council in considering responses has published and submitted to DfI/PAC full copies of all representations and counter representations and where it has not been stipulated clearly by the respondent which section of the Plan or other documentation their comment relates to; or whether they are objecting, supporting or seeking an amendment to the same, planning officers have made an assessment and summarised the issue under what is considered to be the most relevant section of the Plan or other documentation.

Draft Plan Strategy Representations

- 1.14 A total of 122 written representations were made in response to the formal public consultation within the 8-week consultation period. This included representations submitted by Government Departments, other statutory partners, and developers, as well as comments by residents and local groups. The 122 written responses range from short, succinct letters to detailed technical documents and are comprised of 13 from individual members of the public, 46 responses from organizations, including statutory consultees, and 63 responses from planning agents. Three (3) written responses were also submitted specifically relating to the Plan's supporting assessments.

Figure 2: The Number of DPS Representations per Respondent Type**Public Consultation on all DPS representations**

- 1.15 Following the public consultation on the DPS, all the 122 representations received were published on the Council's website for a further 8 weeks, beginning on 11 October 2019 and ending on 6 December 2019. This period allowed for the submission of counter-representations.

Counter-Representations

- 1.16 A total of 26 responses were received within the time period in relation to the published DPS representations and these were made available for public inspection in January 2020. These ranged from individual members of the public, agents and one government department.
- 1.17 Details of all representations and counter representations received to the DPS can be accessed on the Council's website www.antrimandnewtownabbey.gov.uk. In addition, a list of all individuals, organisations and interested parties who submitted a representation or counter-representation to the DPS public consultation is contained within [Annex A](#) of this Report.

2 Summary of Main Issues Raised to Draft Plan Strategy and accompanying Evidence Papers

- 2.1 This section of the Report sets out a high-level summary of the main issues raised under each section of the DPS and a summary of the Council's position on those matters raised. Where relevant, it also includes comments raised in relation to Evidence Papers and the Council's position on these matters. It should be read alongside the full set of representations that are available to view and submitted for IE. In addition, it should be read alongside the accompanying Representation by Issue Report ([DPS-S-002](#)) and Representations by Respondent Report ([DPS-S-003](#)).
- 2.2 In summary, the Council considers the DPS as published to be sound and no significant change is required to the document. The Council also considers that a number of representations raise matters that would be more appropriate to be dealt with at the LPP stage of the LDP process. These relate mainly to the submission of sites for development purposes.
- 2.3 Typographical errors in the DPS identified through the consultation process are set out in [Section 6](#) of this Report. In addition, there are a number of minor policy wording changes that the Council consider may be reasonable for the purposes of factual clarification of the policy. The Council considers that these do not impact on the soundness of the Plan. These changes are set out collectively in [Section 7](#) of this Report and are referenced in the following sections for ease of reference.
- 2.4 A full list of the respondents to the DPS is set out in [Annex A](#) of this Report. For ease of reference a list of abbreviations used in this Report is also set out in [Annex B](#).

Preamble Text

How to Use this Document and Policy Easy Guide	
Summary of Representations	Relevant Reps
<p>Limited comments were received to the nature and content of the How to Use this Document and Policy Easy Guide Section, the issues raised include:</p> <ul style="list-style-type: none"> Positive Planning Note on page 11 of the DPS, DfI (Roads) stated that this section needed to be clearer in terms of how the policy should be read across all policies. DCA states that the reference to material considerations would undermine the LDP and allocations. 	0015, 0107
<p>Council Position: The Council considers the How to Use this Document and Policy Easy Guide Section as drafted is appropriate and reasonable. It is the opinion of the Council that the approach to this section is sound.</p> <p>Having considered those representations that sought modifications in relation to this section the Council considers that no change is required.</p>	

Introduction

Introduction	
Summary of Representations	Relevant Reps
<p>Limited comments were received to the nature and content of the Introduction Section, the issues raised include:</p> <ul style="list-style-type: none"> NIHE requested clarification on the application of prematurity in view of the Joint Ministerial Statement and the status of the DPS. DCA raised concerns that in the past supplementary guidance has been ignored and questioned by what process POP responses had been considered in preparing the DPS. 	0008, 0015
<p>Council Position: The Council considers the Introduction Section as drafted as appropriate and reasonable. It is the opinion of the Council that the approach to this section is sound.</p> <p>Having considered those representations that sought modifications in relation to this section the Council considers that no change is required.</p>	

Setting the Context

Setting the Context	
Summary of Representations	Relevant Reps
<p>Both broad support and comments were received to the nature and content of the Setting the Context Section from a broad spectrum of respondents, including statutory consultees and environmental groups. The issues raised include:</p> <ul style="list-style-type: none"> • Support was expressed from a range of bodies including NIHE, BIA, DE, DfE, DADRA and NIW for items within the section including the regional context, references to housing, education, economic prosperity, BIA, transitional arrangements, infrastructure capacity, industry, reducing inequality in housing and the Council's commitment to working with partners. • There were requests for additional references to be added including 'Lifetime Opportunities, Government's Anti-Poverty and Social Inclusion Strategy for Northern Ireland' from NIHE and the draft Marine Plan and the UK Marine Policy Statement from NIEA. • Comments were received from a range of respondents including NIHE, DCA and DfI in relation to adequate housing being necessary to achieve the Community Plan, the need to reference the heavy commuting flow of traffic into Belfast and concerns regarding the Antrim Area Plan being used as a baseline consideration, when objections to it were ignored. 	<p>0008, 0015, 0030, 0062, 0063, 0074, 0098, 0100, 0102, 0107</p>
<p>Council Position: Broad support for the Setting the Context Section is noted and welcomed, particularly from NIW, DfE, and the DE as statutory consultees. The Council considers the section as drafted is appropriate and reasonable and has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that the approach to this section is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Plan Vision and Strategic Objectives

Plan Vision and Strategic Objectives	
Summary of Representations	Relevant Reps
<p>Both broad support and comments were received to the nature and content of the Plan Vision and Objectives from a broad spectrum of respondents, including statutory consultees and environmental groups. The issues raised include:</p> <ul style="list-style-type: none"> Broadly there was support for the Plan Vision from NIHE, DE, members of development industry, Clanmill Housing Group, NIFHA, including comments that it reflected the aspirations of the Borough, as well as addressing housing and climate change. Responses received from ADAA and SMWT critical of aspects of Plan Vision. Broad support was expressed for individual Strategic Objectives from a range of bodies including, MUDC, NIHE, DE, members of the development industry, ADAA, SMWT and BCC. There were requests from members of the development industry that consideration should be given to extending the Plan period for a longer time to take account of the RDS and achieve the Plan Spatial Growth Strategy. NIHE, ADAA, SMWT, BIA, members of development industry and NIEA made requests for minor amendments to the Strategic Objectives, including but not limited to, provide an ample supply of economic lands; a generous supply of housing; to bring forward a specific objective in relation to BIA; to amend objectives to include references to affordable housing; streams; rivers; trees; upcycling; wilding; timber production; to provide clarity that biodiversity occurs in built up areas and to refer to the marine area. There were requests from members of the development industry for lands to be included for development within the Plan, to help deliver the strategic objectives. 	0008, 0019, 0033, 0035, 0036, 0039, 0040, 0041, 0043, 0044, 0045, 0051, 0054, 0055, 0057, 0063, 0066, 0078, 0080, 0092, 0093, 0095, 0097, 0098, 0099, 0100, 0102, 0104, 0109, 0110, 0113.
<p>Council Position: Broad support for the Plan Vision and Strategic Objectives is noted and welcomed, particularly from NIHE and DE as statutory consultees. The Council considers that the Plan Vision and Strategic Objectives as drafted are appropriate and reasonable and that the approach to these has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that the Plan Vision and Strategic Objectives are sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Sustainable Development

Policy SP 1: Sustainable Development	
Summary of Representations	Relevant Reps
<p>Both broad support and objections were received in relation to the nature and content of SP 1 Sustainable Development from a broad spectrum of respondents including the development industry, statutory consultees, businesses, private individuals, and environmental groups. Whilst not exhaustive, the issues raised include:</p> <p>Sustainable Development</p> <ul style="list-style-type: none"> A range of respondents supported the general principles of delivering sustainable development including NIHE, DfE MAPB/GSNI, DADRA, and DfI. A range of respondents including NIHE and DAERA-NIEA raised several issues including how sustainable development could be furthered in the planning process, consideration of marine legislation and how policy should be applied or developed in the LPP. <p>Development Impact Assessments</p> <ul style="list-style-type: none"> Several respondents requested amendments. NIHE requested that Health Impact Assessments should be included for major developments and DAERA-NIEA stated it would be helpful to highlight the potential impacts also relates to the Council's marine environments. <p>Spatial Growth Strategy (SGS) and the Places of the Borough</p> <ul style="list-style-type: none"> There was a range of support for the SGS including from DfI Strategic Planning, MUDC, BIA and representatives from the development industry as well as businesses, environmental organisations and individuals. This included that the SGS had been robustly prepared, support for the reuse of brownfield land, support for supplementary guidance and that the approach to certain settlements was robust including Metropolitan Newtownabbey, Antrim, Ballyclare, Crumlin, Randalstown, villages, hamlets and the countryside. There was also support for the recognition of the role of BIA and Nutts Corner. A range of respondents including NIHE, DAERA-NIEA, DfI (Transport) and the development industry raised a number of issues including the use of existing commitments; consideration of the marine area; transport infrastructure; failure to take adequate account of the RDS and other documents; that Crumlin and Randalstown should not be 'consolidated' but are places for growth; impact of growth on the countryside; clarification of policy wording relating to the smaller settlements and countryside; that the role of BIA should be strengthened, safeguarded and protected; that the wording of the POP should be used for villages; that Toome should be a rural gateway; that Greenisland had been omitted and that the natural and historic environment should be afforded more protection. There was support for the approach in Places of the Borough from DfI Strategic Planning and representatives from the 	<p>0008, 0009, 0015, 0019, 0024, 0027, 0028, 0033, 0035, 0036, 0039, 0040, 0041, 0044, 0045, 0057, 0058, 0063, 0072, 0074, 0075, 0078, 0080, 0081, 0082, 0085, 0088, 0090, 0092, 0093, 0097, 0098, 0099, 0100, 0102, 0103, 0104, 0105, 0107, 0108, 0109, 0119, 0121.</p>

<p>development industry including the classification of a number of settlements including Metropolitan Newtownabbey, Ballyclare, Randalstown, Dunadry and Parkgate.</p> <ul style="list-style-type: none"> • A range of respondents mainly from the development industry raised concerns regarding where specific settlements sat in the hierarchy including Antrim, Ballyclare and Crumlin. <p>Delivering Sustainable Outcomes</p> <ul style="list-style-type: none"> • There was general support for the policy from key stakeholders and organisations including DfI Strategic Planning, NIHE and INI. • A range of respondents including statutory bodies, environmental groups and individuals raised several issues including the practicality of developer contributions, the circumstances in which they would be requested and that river environments needs to be enhanced. 	
<p>Council Position: Broad support for SP 1 Sustainable Development is noted and welcomed, particularly from NIHE, DfE MAPB/GSNI, DfI and MUDC as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Sustainable Development has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 1 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Employment

Policy SP 2: Employment	
Summary of Representations	Relevant Reps
<p>Both broad support and comments were received from a broad spectrum of respondents including the development industry, statutory consultees, private individuals and environmental groups to the nature and content of Policy SP 2 Employment. Whilst not exhaustive, the issues raised include:</p> <p>Innovation, Investment and Enterprise</p> <ul style="list-style-type: none"> • INI and BIA welcomes the confirmation that the Council is committed to positively promoting economic development, DfE note the target of 9,000 new jobs growth over the next 10 years, a target which is also supported by elements of the development industry and Bombardier, whilst NIHE are supportive of the economic policies. • Elements of the development industry indicate that the target to create 9,000 new jobs should be increased. • INI considers the Plan's economic elements are largely in conformity with the Council's Community Plan, the SPPS, RDS, and PPS 4. <p>Employment Land</p> <ul style="list-style-type: none"> • NIHE welcomes the policy focus on enterprise and employment growth within the main towns across the Borough and whilst it 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, it would suggest that a sequential approach is used to identify employment land which directs employment to the hubs and local towns first. • MUDC and elements of the development industry note the approach taken to employment land and proposed identification of Strategic Employment Locations (SELs) and (Local Employment Sites) LESs and indicates broad support for this approach. • INI note and welcome the Council's approach to the identification and supply of employment lands and suggests that such protection should be afforded to all employment lands unless there is a compelling case for a change of use. • Elements of the development industry indicate that use of word 'range' of sites should be replaced with 'ample' to accord with the SPPS. • INI suggest the flexibility that the Policy provides in smaller settlements is to be welcomed. <p>Strategic Employment Locations</p> <ul style="list-style-type: none"> • Support from elements from within the development industry, DfE, BIA, employment and enterprise groups and private individuals for the policy and identification of SELs, including those at Antrim, Ballyclare, Belfast International Airport, Metropolitan Newtownabbey and Nutts Corner. 	<p>0004, 0005, 0008, 0011, 0019, 0021, 0030, 0033, 0035, 0036, 0039, 0040, 0041, 0043, 0044, 0045, 0051, 0053, 0056, 0057, 0058, 0059, 0063, 0070, 0073, 0075, 0080, 0081, 0085, 0094, 0095, 0096, 0100, 0107, 0108, 0110, 0117, 0118, 0121.</p>

- NIHE supports the presumption against the alternative use of land and premises within SELs and LESSs.
- Bombardier consider that the lands at Church Road, Metropolitan Newtownabbey do not function as a SEL.
- Given the ample supply of employment land that already exists, LCCC question the need for two additional SELs at Antrim and Ballyclare, as well as the extension to BIA SEL. Whilst LCCC do not object to the Nutts Corner SEL individually, when combination with the proposed extension of BIA and the two proposed SELs at Antrim and Ballyclare, it has concerns these may impact on its economic strategy (i.e., cumulative effect).
- DfI (Strategic Planning) suggests the Council should continue to engage with infrastructure providers to ensure that the policy approach can be supported by the necessary infrastructure at rural locations.
- A respondent indicated that subject lands at Karl Business Park, Antrim could be considered for the wider development of a SEL or incorporation as part of the BIA SEL.

Belfast international Airport SEL

- A respondent considers the Plan Strategy 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 and its Masterplan, whilst another respondent indicates 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.
- A respondent considers that the policy would permit 'business' and 'other complementary employment and service uses' at the proposed BIA SEL, that should normally be permitted in town centre and mixed service centre locations.

Local Employment Sites

- INI indicate that a variety and choice of investment locations is to be welcomed, whilst elements of the development industry indicate support for policy relating to the identification of LESSs.

Agricultural Sector

- Some indication should be provided as to what will be deemed an 'appropriate' farm diversification scheme.

Town Centres and Retailing

- A range of respondents including NIHE, MUDC, AADA, and SMWT raise several issues which indicate broad support for the retail policies, town centre first approach, application of a sequential test and the Plan's proposed Retail Hierarchy.
- One respondent raised concerns that dereliction within town centres was not adequately addressed in the Plan.
- Elements of the development industry endorsed Antrim Town and Abbey Centre as Tier 1 Centres in the proposed Retail Hierarchy.
- A range of respondents including DfI, BCC, elements of the development industry and private individuals have included comments with concerns regarding the proposed retail hierarchy including, Abbey Centre designated as a 'Large

<p>Town Centre', Antrim would be more appropriate as a Tier 2 centre and Whiteabbey Village proposed as a District centre.</p> <ul style="list-style-type: none"> • DfI (Strategic Planning) 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. • A respondent considers that the title should be 'Town Centre Uses (Including Retail)' to make it explicable clear that that it applies to all town centre uses. • Various respondents indicated that additional centres be designated including, lands close to Global Point SEL as either a town or district centre and a local centre at Dunadry. <p>Tourism</p> <ul style="list-style-type: none"> • DfE welcomes the Council's aim to promote sustainable tourism. • It was suggested 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. <p>Positive Planning Note</p> <ul style="list-style-type: none"> • 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. 	
<p>Council Position: Broad support for various elements of Policy SP 2: Employment is noted and welcomed, particularly from INI, BIA, NIHE, as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Employment has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 2 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Policy DM 1: Economic Development – Zoned Sites and Settlements	
Summary of Representations	Relevant Reps
<p>Both broad support and comments were received from a range of respondents including elements of the development industry, planning consultants, government departments and private individuals to the nature and content of Policy DM 1: Economic Development – Zoned Sites and Settlements. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • INI considers the provisions of Policy DM 1 are consistent with PPS 4 and the SPPS and welcomes the protection afforded to SELs from competing land uses, while DVA and NIHE welcomes and supports the policy. 	<p>0008, 0043, 0050, 0053, 0063, 0075, 0086, 0095, 0100, 0107, 0108, 0117, 0118, 0119.</p>

- INI advises that the Council should consider providing guidance on the range and scale of uses it would consider to be acceptable at each SEL.
- A planning consultant considers Policy DM 1 would inappropriately allow town centre uses such as offices and call centres in SELs and other zoned employment sites.
- Elements from within the development industry are supportive of the policy text in relation to the range of appropriate uses within SELs, except for Nutts Corner.
- Elements from within the development industry objected to the policy as it is considered would curtail the uses permitted at Nutts Corner SEL and distinguish it from other SELs. Provision should be made for appropriate complementary uses based on individual merit.
- A range of comments were received from elements from within the development industry including, reassurance regarding the inclusion of Policies DM 1, DM 1.1 and DM 1.2, which reinforce the designation of Nutts Corner as a Strategic Employment Location, however, suggest that all Class B uses should be considered appropriate and furthermore this flexibility help contribute to meeting the projected 9,000 jobs growth target.
- Elements from within the development industry suggest Nutts Corner SEL should have its own specific policy as given its rural location, it is considered misplaced under Zoned Sites and Settlements.
- Elements from within the development industry suggest it is not clear that the zoning can be delivered due to possible infrastructure challenges, while there should be recognition in the policy for historic uses on brownfield land as sustainable locations for economic growth within Nutts Corner SEL.
- DfI considers 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 to direct economic development to Antrim as appropriate.
- DfI makes a number of comments on detailed policy wording in relation to Policies DM 1.4, 1.5 and 1.6, which it considers require clarification and suggests there is no explanation as to why acceptable uses at Nutts Corner SEL are limited, i.e., lack of public transport.
- BIA welcomes the proposed acceptable uses at SELs, however considers this does not reflect the strategic objectives set out regarding the wider range of airport related and complementary uses, which should be set out in an 'airport-specific' policy.
- INI considers that policy wording relating to LES could be considered a departure or relaxation from PPS4 and the SPPS and requests that LES are afforded strong policy protection as they can provide opportunities to those businesses for which a setting within a SEL may not be suitable. Suggests that the 12-month threshold under Policy DM 1.4(a) is too low.
- A planning consultant indicates that insufficient provision is made for growth of local major employers, for example at Randalstown.

Council Position: Broad support for Policy DM 1: Economic Development - Zoned Sites and Settlements is noted and welcomed, particularly from INI, NIHE and DVA as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Economic Development - Zoned Sites and Settlements has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 1 is sound.

Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in [Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required.

Policy DM 2: Economic Development - Countryside

Summary of Representations

Both broad support and comments were received from government departments and planning consultants to the nature and content of Policy DM 2: Economic Development - Countryside. Whilst not exhaustive, the issues raised include:

- NIHE supports the location of economic development sites with land within settlements being considered first, before open countryside sites are investigated to protect rural character.
- INI and a planning consultant considers the provisions of this Policy largely align with the policy provisions of the SPPS and PPS 4, however considers that Policy DM 2.8 differs from PPS 4 which also makes exceptions for potential social and affordable housing schemes.
- A planning consultant raises concern that Policy DM 2 leaves a void regarding the development for the 'brownfield' sites previously used as WW2 airfields, several of which exist within the Borough.
- DfI makes several comments on detailed policy wording for the purposes of clarity in relation to Policy DM 2.7(b) and DM 2.9.

Relevant Reps

0008, 0023, 0100, 0107, 0108.

Council Position: Broad support for Policy DM 2: Economic Development - Countryside is noted and welcomed, particularly from INI and NIHE as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and the approach to Economic Development - Countryside has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 2 is sound.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

Policy DM 3: Economic Development – Incompatible Uses	
Summary of Representations	Relevant Reps
<p>Broad support and comments from DfI and INI were received to the nature and content of Policy DM 3: Economic Development – Incompatible Uses. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> DfI considers it would be clearer if the content of SPPS para. 1.14 was repeated in the policy and make comment around the status of supplementary planning guidance once the PPSs are removed. INI considers the provisions of this policy are consistent with PPS4 and the SPPS and notes the policy commitment to apply Policy PED 8 supplementary guidance. 	0107, 0108
<p>Council Position: Broad support for Policy DM 3: Economic Development – Incompatible Uses is noted and welcomed, particularly from INI as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Economic Development – Incompatible Uses has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 3 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 4: Agricultural Development	
Summary of Representations	Relevant Reps
<p>Broad support and comments were received from a range of respondents including environmental groups, private individuals, and government departments and planning consultants to the nature and content of Policy DM 4: Agricultural Development. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> ADAA, SWMT and a private individual consider this part of the Plan is dealt with in a cursory manner and that agricultural buildings need to be erected with more consideration for the environment, whilst agricultural activities impact upon water quality and the environment. A planning consultant is critical of the policy for a range of reasons including, overlap with permitted development rights, lacks flexibility for infant businesses and farms or outlier farms with no existing farm buildings. DfI notes that there appears to be no reference within the DPS to forestry development as per the SPPS. NIEA welcomes Policy DM 4.4 which addresses environmental effects in relation to ammonia production. 	0036, 0049, 0057, 0058, 0102, 0107.
<p>Council Position: Broad support for Policy DM 4: Agricultural Development is noted and welcomed, particularly from NIEA as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Agricultural</p>	

Development has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 4 is sound.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

Policy DM 5: Farm Diversification

Summary of Representations

Relevant Reps

Broad support and comments were received from a range of respondents including INI and planning consultants to the nature and content of Policy DM 5: Farm Diversification. Whilst not exhaustive, the issues raised include:

- Planning consultants have raised a range of issues including, consider Policy DM 5.1 precludes farm diversification for any project that has not been active for the last six years continuously and therefore lack flexibility and has not considered alternatives; farm diversification should not be limited to the re-use of existing buildings only, as sometimes new buildings will be required and the range of activities listed could also include the sort of businesses requiring a rural, contamination-free location.
- INI considers the provisions of this policy are consistent with the PPS 4 and the SPPS.

0048, 0094, 0108.

Council Position: Broad support for Policy DM 5: Farm Diversification is noted and welcomed, particularly from INI as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Farm Diversification has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 5 is sound.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

Policy DM 6: Development within Centres

Summary of Representations

Relevant Reps

A range of comments were received from government departments and planning consultants to the nature and content of Policy DM 6: Development within Centres. Whilst not exhaustive, the issues raised include:

- NIHE welcome the reference to housing as an acceptable use in town centres and would like to see flexibility over parking standards in such locations.
- INI welcomes the Council's commitment to support a diverse range of retail and complementary uses within the Borough's centres while suggesting that the Council might wish to clarify what is an 'acceptable complementary use'.

0008, 0042, 0055, 0107, 0108.

<ul style="list-style-type: none"> Several planning consultants expressed concern that the policy requires retail proposals to demonstrate how they will contribute to vitality and viability, maintain visual amenity and support footfall etc. Suggests this is a blunt approach and an unnecessary hurdle. A planning consultant considers that the role and function of town centres has evolved and in this context 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; whilst the 12 months' requirement is considered excessive; and no provision has been made for temporary or meanwhile uses. DfI make a number of detailed policy comments including, consider the policy does not meet the provisions of SPPS which requires policy to make clear which uses will be appropriate within each element of the retail hierarchy; an omission from the provisions of the SPPS where outside of town centres, applications for retail or town centre type developments require retail need to be assessed; and it is unclear how DM 6.1 will be assessed and it is unclear if Policy DM 6.4 will allow residential uses on the upper floor of the Abbey Centre. 	
<p>Council Position: Broad support for Policy DM 6: Development within Centres is noted and welcomed, particularly from NIHE as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and the approach to Development within Centres has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 6 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Policy DM 7: Development outside Centres	
Summary of Representations	Relevant Reps
<p>Broad support and comments were received from government departments and planning consultants to the nature and content of Policy DM 7: Development outside Centres. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> DE is supportive of the policy provisions relating to the proposed flexibility in providing for education facilities in out-of-centre locations. DfI make several detailed policy comments including, the provisions of Policy DM 7.1 in relation to the sequential test are not reflective of the SPPS and under Policy DM 7.2 states that 'commercial centre' is not defined. Under Policy DM 7.5 could be seen as permissive and does not fully take account of the SPPS as it does not include reference to retail assessment being required for extensions which would result in the overall 	0098, 0107, 0118.

<p>development exceeding 1,000 square metres. Considers that under Policy DM 7.6, it is unclear as to whether this policy is applicable to all proposals involving an increase of more than 1,000 square metres, as it is noted that many restrictive conditions relate to retail warehouses that fall short of the 1,000 square metre threshold. Considers that it is unclear if Policy DM 7.7 applies to Local Centres and that it would be useful if Policy 7.8 (b) and Policy DM 7.9 clearly defined what is 'small-scale' convenience development.</p> <ul style="list-style-type: none"> • A planning consultant considers the proposed policy wording, 'that generate significant footfall' lacks clarity and is open to interpretation. 	
<p>Council Position: Broad support for Policy DM 7: Development outside Centres is noted and welcomed, particularly from DE as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Development outside Centres has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 7 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Policy DM 8: Development at The Junction, Antrim	
Summary of Representations	Relevant Reps
<p>A range of comments were received from government departments and planning consultants to the nature and content of Policy DM 8: Development at The Junction, Antrim. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • A planning consultant objects to the provisions of Policy DM 8, which it considers seeks to impose a range of unnecessary restrictions on future development at The Junction, Antrim which it considers are overly onerous. • DfI make a number of detailed policy comments including, considers that for the purposes of clarity it would be beneficial to incorporate the details of The Junction Masterplan into the DPS; notes 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; and Policy DM 8.2 does not clarify if the Council will consider any exceptional circumstances. • A planning consultant 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. 	0073, 0107, 0118.

Council Position: The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Development at The Junction, Antrim has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 8 is sound.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

Policy DM 9: Tourism Development

Summary of Representations

Relevant Reps

Broad support and comments were received from a range of groups including government departments, environmental groups and planning consultation to the nature and content of Policy DM 9: Tourism Development. Whilst not exhaustive, the issues raised include:

- MUDC welcomes Policy DM 9 which helps to ensure high quality considered design and promotes sustainable development.
- A planning consultant made a number of comments on detailed policy wording including, considered the Council should support proposals that provide new and enhanced tourist amenities, and the extension of existing tourist amenities; it is not clear from the wording of Policy DM 9.2 whether all four criteria (a) to (d) must all be met; new hotels and guesthouses could be located in many locations in the rural area and should not be tied to a specific locational need; it will not be possible to create a 'new' caravan site under Policy DM 9.6 and it is not clear whether all four criteria (a) to (d) must all be met; whilst Policy DM 9.8 is unnecessary.
- DADRA support the approach being taken in the DPS, in particular, the requirement that satisfactory information must be submitted for proposals in the countryside to demonstrate a robust business case and considers this should be extended to all renewable energy applications.
- RSPB NI considers that the LDP should steer tourism related development away from sensitive areas and that the full provisions of SPPS para. 6.266 are carried over to the Plan Strategy.
- DfI make a number of detailed policy comments including, considers the reference to 'easily accessible' under Policy DM 9.1 and 9.10(c) may be open to interpretation; it is unclear if this policy solely relates to proposals outside settlement limits and does not reflect the requirement to demonstrate that no suitable alternative sites are available within a settlement as outlined at SPPS para. 6.260; Policy DM 9.9 omits the thrust of the SPPS that such development will be in exceptional circumstances; the term 'satisfactory information' under Policy DM 9.10(d) could prove open to interpretation and is considered too flexible; and considers it is difficult to understand how Policy DM 9.10 (e) can be accomplished on the basis that the Council's own 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.

Council Position: Broad support for Policy DM 9: Tourism Development is noted and welcomed, particularly from MUDC as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Tourism Development has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 9 is sound.

Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in [Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required.

Evidence Paper 3: Economic Growth

Summary of Representations

Relevant Reps

Several comments were also received relating to Evidence Paper 3: Economic Growth. Whilst not exhaustive, the issues raised include:

- Several planning consultants note that the Council has identified substantial evidence to demonstrate and support the inclusion of Nutts Corner as a SEL.
- DfI welcome the approach following on from the ELER to identify and safeguard a range of sites of industry and employment, while noting the approach to not designate a further SEL location at Randalstown.
- Bombardier question the robustness of the Employment Land Evaluation Report (ELER) evidence base.
- INI note the approach taken by the Council in the ELER, whilst providing comment that its property as Global Point and Antrim Technology Park should not be considered as vacant or underutilised.
- LCCC disagree with the conclusion regarding the functions of West Lisburn, BIA and Nutts Corner SELs, whilst there is no evidence to support the conclusion that West Lisburn will only serve a smaller scale local employment need.

0043, 0053,
0070, 0096,
0107, 0108

Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document, rather they seek the inclusion of additional information in one of the accompanying evidence papers. The Council will consider the matter raised when it brings forward any update of its evidence papers.

Evidence Paper 4: Retail and Commercial Leisure	
Summary of Representations	Relevant Reprs
<p>Several comments were also received relating to Evidence Paper 4: Retail and Commercial Leisure. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • A planning consultant raised a number of issues including, lack of clarity around the status of the draft centre boundaries; the draft town centre boundaries are too restrictive, particularly in Antrim; and the lack of defined town centre boundaries has the potential to limit town centre first development and delay the implementation of the policies. 	0118
<p>Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document, rather they seek the inclusion of additional information in one of the accompanying evidence papers. The Council will consider the matter raised when it brings forward any update of its evidence papers.</p>	

Evidence Paper 5: Tourism	
Summary of Representations	Relevant Reprs
<p>Several comments were also received relating to Evidence Paper 5: Tourism. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • Tourism NI is reassured that the Plan's current operational planning policy review found policy to be acceptable to the Borough's current needs. • NIEA consider that the Tourism Evidence Paper should give appropriate reference to marine policy documents and legislation. 	0030, 0102
<p>Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document, rather they seek the inclusion of additional information in one of the accompanying evidence papers. The Council will consider the matter raised when it brings forward any update of its evidence papers.</p>	

Local Policies Plan Issues: Lands to be Identified for Future Employment Use	
Summary of Representations	Relevant Reps
<p>A considerable number of responses to the Employment section of the DPS advocate specific areas of land to be considered for future employment use. Many of these contained detailed analysis of the site, including infrastructure, environmental and landscape attributes.</p> <p>Various lands were identified for inclusion within SELs at:</p> <ul style="list-style-type: none"> • BIA and Nutts Corner. <p>Lands were identified for exclusion from SELs at:</p> <ul style="list-style-type: none"> • South of Antrim Road, Mallusk. <p>Lands were identified for designation as LESs at:</p> <ul style="list-style-type: none"> • Antrim Business Park. • Largy Road, Crumlin. <p>Various lands were identified for future mixed-use development at:</p> <ul style="list-style-type: none"> • Antrim and Metropolitan Newtownabbey. 	0004, 0005, 0009, 0021, 0023, 0043, 0053, 0063, 0079, 0080, 0085, 0095, 0100, 0117, 0122.
<p>Council Position: Due to the site-specific nature of these issues, these are matters to be dealt with at the Local Policies Plan stage which will consider site-specific designations/boundaries and the zoning of land.</p> <p>No change to DPS as published is warranted nor is it considered this matter impacts on the soundness of the Plan.</p>	

Transportation and Infrastructure

Policy SP 3: Transportation and Infrastructure	
Summary of Representations	Relevant Reps
<p>Broad support and one objection were received from a range of the Council's statutory partners, environmental groups and private individuals for the nature and content of Policy SP 3 Transportation and Infrastructure. Whilst not exhaustive, the main issues raised include:</p> <ul style="list-style-type: none"> MUDC, BCC: Encouraged by the Council's commitment to working with its statutory partners to improve cross boundary 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. Highlights the key test for soundness is the consideration of cross boundary issues. NIHE: Supports the Plan's promotion of accessibility and encouragement of a modal shift away from private car usage towards more sustainable and active transport choices, particularly as approximately 20% of the Borough's residents have no access to a private car. Notes that the Borough's existing rail network lacks connectivity, for example the lack of rail halts and the lack of a dedicated rail link to Belfast International Airport. AADAA, SMWT: Welcomes the Plan's proposal to improve transport connectivity across the Borough. The Council's acknowledgement of infrastructure capacity constraint issues (especially for WWTW) in the Borough and encouragement for the improvement of digital infrastructure such as Wi-Fi and super-fast broadband services, was welcomed by private individuals. Requests for amendments to policy and addition of policy including MEABC regarding the noted absence of a dedicated Greenway Policy within the Plan; specifically, to protect regional gateways which straddle neighbouring council boundaries <p>Transportation Schemes</p> <p>Broad support was received from a range of the Council's statutory partners, BIA and private individuals for the nature and content of Policy SP 3.2-3.4 Transportation Schemes. Whilst not exhaustive, the main issues raised include:</p> <ul style="list-style-type: none"> ABCBC and BCC: Welcomes the Council's approach to promote sustainable transport. BCC welcomes the Council's approach to identify and facilitate development of community gateways throughout the Borough and beyond. DfI (TMPU): Supports the Council's policy approach for the protection of disused transport routes and the promotion of opportunities for their reuse for transport or recreational purposes, and active travel (walking and cycling). Translink: Welcomes the Council's support for the upgrade of local road networks and connections with public transport such as Park and Ride facilities. 	<p>0001, 0008, 0010, 0013, 0016, 0019, 0020, 0026, 0030, 0036, 0037, 0040, 0044, 0051, 0057, 0058, 0063, 0077, 0096, 0101, 0107, 0108</p>

- DfE: Consider that high quality transportation links facilitates effective and efficient transport movement across the Borough, supports inward investment and helps promote a vibrant economy.
- BIA and LCCC: Supports the establishment a rail link to Belfast International Airport.
- LCCC: Supportive of a joined-up approach with the Council to promote enhanced connectivity to BIA (including potential re-opening of the in operational Lisburn to Antrim railway link).
- Whilst indicating policy support, DfE noted that residents of the Borough often require multiple transport choice to access the Northern Regional Campus (NRC) sites at Newtownabbey and Ballymena. Translink and DfI (Roads) note that some Transportation Schemes listed in Policy SP 3.2 are beyond the control and remit of the Council.
- Whilst the policy received support, several detailed policy wording changes were recommended. These related to the forthcoming Local Transport Study (LTS) and the potential to include the dualling of the Templepatrick Road and Ballyrobin Road, a by-pass of Templepatrick, the reintroduction of the rail connection from Lisburn to Antrim and a dedicated rail halt at Belfast International Airport.

Integration of Transport and Land Use

Broad support was received from the Council's statutory partner, NIHE for the nature and content of Policy SP 3.5 Integration of Transportation and Land Use. Whilst the policy received support, a detailed policy wording change was recommended by DfI (TPMU). This relates to policy consistency with the SPPS. INI recognises and welcomes the Council's ongoing engagement with its statutory partners to actively promote and manage sustainable patterns of growth.

Active Travel

Broad support was received from the Council's statutory partner NIHE, and local environmental groups for the nature and content of Policy SP 3.6 Active Travel. Whilst not exhaustive, the main issues raised include:

- NIHE: Consider that new developments should be concentrated in locations with good access to public transport, walking and cycling facilities. Policies which support active travel can improve resident's health and wellbeing. Reduction in car usage can lead to a reduction in greenhouse gas emissions, helps promote active lifestyles, and can contribute to more cohesive communities (key aims of the SPPS).
- Support for the Council working with DfI and other strategic partners to ensure that a high proportion of additional trips are conducted by sustainable means such as walking and cycling. Supportive of the reuse of disused railway lines for active travel choices.
- Whilst the policy received support, detailed policy wording changes were recommended by DfI (TPMU). These relate to policy wording consistency with the Programme for Government (PfG) and the SPPS.

Transport Assessments and Travel Plans

A neutral response was received from DfI (TPMU) for the nature and content of Policy SP 3.7; and support was received from DfI (Strategic Planning) for the nature and content of Policy SP 3.9 Transport Assessments and Travel Plans.

The Council was encouraged to help contribute to the overall reduction in the level of private car-based traffic generated throughout the Borough. DfI (TPMU) recognise that Transport Assessments and Travel Plans alone do not on their own make a development inherently accessible or sustainable and consider there must be a combined policy approach to the promotion of sustainable transportation choices.

Access and Parking

While respondents were silent in objecting to the nature and content of Policy SP 3.10. DfI (Strategic Planning), several policy wording changes were recommended.

Car Parks

- DfI (TPMU) and BIA considers the Plan's airport car parking policy wording as appropriate and clear.
- Responses noted the Plan's reference to the Council's forthcoming draft Car Parking Strategy.

Whilst the policy received broad support, several objections and detailed policy wording changes were recommended also. Whilst not exhaustive, these include:

- DfI (Strategic Planning) consider the Plan does not consider suitable car parking demand management measures to influence a modal shift away from the reliance on the private car to more sustainable travel choice.
- BIA: McCausland Airport Garages Ltd suggests that a sequential test should apply in Policy SP 3.12 for land in or adjacent to the identified area of airport use.
- BIA: The Hyde family consider policy wording is inconsistent with the RDS and SPPS and is not in the public interest. Consider the policy reinforces an unfair advantage to car parking within the confines of the airport boundary with no requirement to justify the scale or location of parking within that zoning (i.e., the policy acts in the commercial interests of one private party over another). Requests the removal of the requirement for third party operators to provide justification of need that implicitly requires consideration of data that is not within the public domain.

Belfast International Airport

BIA consider that the Plan will adequately enable the airport to maintain, improve or expand existing operational facilities to meet anticipated growth needs.

Whilst the policy received support, a detailed policy wording change was recommended by the Hyde family relating to policy compliance with regional planning policy, the RDS.

<p>Telecommunications and Digital Services</p> <p>Broad support was received from the DfE for the nature and content of Policy SP 3.16 Telecommunications and Digital Services. DfE welcomes the Council's approach to enhancing digital connectivity and view the Plan as making a positive contribution to regional economic growth, increased entrepreneurial start-up activity and home working opportunities.</p> <p>Whilst the policy received support, Virgin Media have requested the inclusion of broadband-specific planning policies within the Plan and for the Council to publish Supplementary Planning Guidance (SPG) specific to telecommunication development proposals in the Borough.</p> <p>Public Utilities and Infrastructure</p> <p>Respondents were silent in offering any objection to the nature of content of Policy SP 3.17 Public Utilities and Infrastructure.</p>	
<p>Council Position: Broad support for Policy SP 3 Transport and Infrastructure is noted and welcomed, particularly from ABCBC, BCC, DfE, DfI (TMPU), LCCC, MUDC, and the NIHE as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Transport and Infrastructure has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 3 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Policy DM 10: Access and Parking	
Summary of Representations	Associated Reps
<p>Whilst support was received from DfI (Roads) and the NIHE for the nature and content of Policy DM 10 Access and Parking, several detailed policy wording changes were recommended. Whilst not exhaustive, these include:</p> <p>DfI (Roads): Policy DM 10.1, the word 'local' road network should be removed as capacity issues may extend beyond local roads.</p> <p>NIHE: Policy wording should afford some flexibility in the application of parking standards to support affordable housing schemes. This would reflect lower car ownership levels associated with social housing in comparison to other housing tenures (56% of social housing tenants do not have access to a car, compared to NI average of 20%).</p> <p>DfI (Roads) notes that the Council will continue to take account of the Departments supplementary planning guidance DCAN 15 – Vehicular Access Standards.</p>	0008, 0107

Council Summary: Broad support for Policy DM 10 Access and Parking is noted and welcomed, particularly from DfI (Roads) and the NIHE as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Access and Parking has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 10 is sound.

Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in [Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required.

Policy DM 11: Access to Protected Routes	
Summary of Representations	Relevant Reps
<p>Whilst support was received from DfI (Roads) and Translink for the nature and content of Policy DM 11 Access to Protected Routes, several detailed policy wording changes were recommended. Whilst not exhaustive, these include:</p> <ul style="list-style-type: none"> • Direct access to Protected Routes for public transport interchanges and motorway service areas. • The definition of field gate accesses. • The Council's consideration of proposals of regional significance. • General road safety issues. 	0013, 0107
<p>Council Summary: Broad support for Policy DM 11 Access to Protected Routes is noted and welcomed, particularly from DfI (Roads) and the NIHE as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Access to Protected Routes has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 11 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Policy DM 12: Active Travel (Walking and Cycling)	
Summary of Representations	Relevant Reps
Broad support was received from BCC and environmental groups for the nature and content of Policy DM 12 Active Travel (Walking and Cycling). Responses were supportive of the Council's policy approach in terms of contributing to overcoming the historic lack of adequate	0008, 0036, 0051, 0057, 0107

<p>footpaths and cycle routes across the Borough, and the promotion of measures in the design and layout phase of development proposals to support increased walking and cycling.</p> <p>Whilst the policy received broad support, several detailed policy wording changes were recommended from DfI (Roads) and NIHE. These relate to policy interpretation and the health benefits of increased walking and cycling.</p>	
<p>Council Position: Broad support for Policy DM 12 Active Travel (Walking and Cycling) is noted and welcomed, particularly from BCC as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Active Travel (Walking and Cycling) has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 12 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Policy DM 13: Belfast International Airport – Operations	
Summary of Representations	Relevant Reps
<p>Broad support was received from DfI (Roads) and BIA for the nature and content of Policy DM 13 Belfast International Airport - Operations.</p> <p>BIA was supportive of the Council's policy approach regarding the restriction of development within the identified Belfast International Airport Public Safety Zones, Major Noise Zones and Airport Safeguarding.</p> <p>Whilst the policy received broad support, DfI (Roads) recommended policy wording changes relating to cross referencing this policy to other policies within the Plan.</p>	0063, 0107
<p>Council Position: Broad support for Policy DM 13 Belfast International Airport – Operations is noted and welcomed, particularly from DfI (Roads) as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Belfast International Airport – Operations has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 13 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 14: Public Utilities and Infrastructure	
Summary of Representations	Relevant Reps
<p>Support was received from several of the Council's statutory partners, service providers, local charities, and private individuals for the nature and content of Policy DM 14 Public Utilities and Infrastructure. Whilst not exhaustive, the main issues raised include:</p> <ul style="list-style-type: none"> • NIW: Considers that good quality public utilities are a pre-requisite to facilitating the development of the Borough. High quality infrastructure facilitates the effective and efficient movement of people and goods across the Borough, supports inward investment and helps maintain a vibrant economy. • NIW: Welcomes continued engagement with the Council on LDP matters. • NI Electricity Networks: Considers the Council's aim for public utilities and infrastructure to achieve a sustainable balance between prosperity and protection of the environment was welcomed. • The RSPB NI: Recommends the Council to support the location of all new electricity infrastructure lines underground, to maintain the amenity of landscapes across the Borough. <p>Whilst the policy received broad support, the DfI (Strategic Planning), NI Electricity Networks, NIW and the RSPB NI recommended policy wording changes including:</p> <ul style="list-style-type: none"> • Alignment with NIW policy regarding development and encroachment (Odour Assessment policy). • Interpretation of policy wording with the Plan's supporting Landscape Character Assessment (LCA) (Evidence Paper 16 – DPS 022). Considers the policy wording is overly restrictive and could place limitations on the ability of organisations to achieve other government targets. • To cross reference the Plan to the UK Marine Policy Statement and the draft Marine Plan for NI given the potential impact on marine, coastal and transitional waters from the outfall from WWTW into Belfast Lough. • Regarding WWTW capacity issues within the Borough, DfI (Strategic Planning) requests the Council considers this issue when zoning land and the opportunity to adopt a phased approach to development. 	0040, 0062, 0102, 0103, 0106, 0107
<p>Council Position: Broad support for Policy DM 14 Public Utilities and Infrastructure is noted and welcomed, particularly from NIW as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Public Utilities and Infrastructure has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 14 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in</p>	

[Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required.

Policy DM 15: Development Relying on Non-Mains Sewerage

Summary of Representations

Relevant Reps

Support was received from the Council's statutory partner DfI (Roads) and environmental groups for the nature and content of Policy DM 15 Development Relying on Non-Mains Sewerage. AADAA and the SMWT considers that:

- The Plan actively supports the provision of high-quality public infrastructure (thus avoiding overflows of sewerage into rivers and the sea).
- Notes the historic underinvestment in wastewater treatment plants.
- It important for the Plan to state that development cannot take place where waste treatment plants are substandard.

Whilst the policy received support, DfI (Roads) has requested that the Plan includes additional wording relating to compliance with NI Water's publication 'Sewers for Adoption, NI'.

Council Position: Broad support for Policy DM 15: Development Relying on Non-Mains Sewerage is noted and welcomed, particularly from DfI (Roads) as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Development Relying on Non-Mains Sewerage has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 15 is sound.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

Policy DM 16: Telecommunication Facilities and Digital Services

Summary of Representations

Relevant Reps

General support was received from the Council's statutory partner, DfI (Roads) and a private individual for the nature and content of Policy DM 16 Telecommunication Facilities and Digital Services. There is an acknowledgement that the policy aims to support the improvement of Wi-Fi and super-fast broadband services across the Borough, and continued access to national and international markets.

DfI (Strategic Planning) recommended policy wording changes relating to policy compliance with ICNIRP guidelines and the assessment of potential interference caused by proposed telecommunication facilities and digital services development, and clarity regarding the terminology 'Code System Operators and Broadcasters'.

Council Position: Broad support for Policy DM 16: Telecommunication Facilities and Digital Services is noted and welcomed, particularly from DfI (Roads) as statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Telecommunication Facilities and Digital Services has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 16 is sound.

Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in [Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required.

Evidence Paper 10: Transportation

Summary of Representations

A private individual considers the Plan's supporting Evidence Paper 10: Transportation (**DPS 016**) lacks robust evidence to justify the Council's Plan approach to airport car parking provision.

Relevant Reps

0101

Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document. The Council will consider the matter raised when it brings forward any update of its evidence papers.

Evidence Paper 11: Infrastructure

Summary of Representations

DfI (Water and Drainage Policy Division) supports the Plan's supporting Evidence Paper 11: Infrastructure (**DPS 017**) where it relates to water and waste water capacity in the Borough, and the encouragement for developers to consult with NI Water at the early stages of a development proposal. DfI are encouraged by the Council's ongoing consultation with NI Water regarding infrastructure issues in the Borough. Furthermore, DfI note the waste water capacity issues noted within the Evidence Paper, and requests the Council consider this at the site-selection, Local Policies Plan stage of the Local Development Plan.

NIEA (NED) requests an update to Evidence Paper 11 where it relates to waste water capacity and potential impacts upon the marine area of Belfast Lough.

Relevant Reps

0102, 0107

Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document. The Council will consider the matter raised when it brings forward any update of its evidence papers. The Council is also

bringing forward a minor change to the DPS in relation to marine and it is considered this is sufficient. This is set out in to [Section 7 of this Report](#).

Homes

Policy SP 4: Homes	
Summary of Representations	Relevant Reps
<p>Both broad support and comments were received to the nature and content of Policy SP 4: Homes from a broad spectrum of respondents including the development industry, statutory consultees, private individuals, and environmental groups. Whilst not exhaustive, the issues raised include:</p> <p>Housing Growth and Allocation</p> <ul style="list-style-type: none"> • Elements of the development industry are supportive of the approach within the DPS in respect of determining the housing growth figure and allocations to settlements and the rural area. • A range of respondents primarily from within the development industry, NIFHA and housing associations expressed a range of views including, considers the current housing growth figure does not take account of the RDS and has the potential to undermine the SGS, is too restrictive when considering the LDP Timetable, is inflexible in dealing with potential change in circumstances prior to adoption of the Local Policies Plan, underestimates need, does not reflect the ambitious economic growth plan of neighbouring BCC and the retention of the labour force in the Borough, and is not based on a robust evidence base. • Elements from within the development industry consider the housing growth figure should revert to that proposed in the POP. • DfI (Strategic Planning) requested the Council should take account of the then unpublished revised 2016-based HGI. • DCA and RSPB NI have raised issues which consider that there is no reassurance that the housing growth figure will not be exceeded, and this may have potential impacts on the environment. • Elements from within the development industry note the flexible approach taken by the Council in respect of economic development land and advocates a similar approach should also be adopted to housing growth. • A range of respondents including NIHE, the development industry and DfI raised a range of issues including, the general approach to the housing allocation process fails to take into account a range of factors including the RDS, the needs of specific settlements, sustainable development, availability of housing lands, the NIHE Housing Needs Assessment and demand placed on local infrastructure, particularly transport. • There was support for the proposed housing allocation from within the development industry, BCC, NIW and DfI to various settlements in the Borough including, Metropolitan Newtownabbey, Antrim, Ballyclare, Crumlin, Randalstown and Burnside, as well as strong support for the proportional allocation to the 3 largest settlements. • Elements from within the development industry and NIHE, as well as private individuals have raised concerns raised over the level of housing allocation to various settlements including 	<p>0007, 0008, 0009, 0015, 0017, 0022, 0024, 0028, 0033, 0035, 0038, 0039, 0040, 0041, 0044, 0045, 0051, 0052, 0054, 0062, 0066, 0067, 0068, 0069, 0072, 0076, 0078, 0079, 0080, 0083, 0084, 0088, 0089, 0090, 0091, 0092, 0093, 0097, 0099, 0103, 0104, 0105, 0107, 0109, 0110, 0114, 0117, 0120, 0121</p>

<p>Metropolitan Newtownabbey, Antrim, Crumlin and Randalstown, Ballyrobert, Burnside, Doagh, Dunadry, Parkgate, Templepatrick, Straid, Toome, Moneyglass and the rural area.</p> <ul style="list-style-type: none"> • Elements from within the development industry consider there are deliverability issues around existing land for housing in a range of settlements, including Ballyclare. <p>Identification of Land for Housing</p> <ul style="list-style-type: none"> • A number respondents including DfI and NIHE made a range of comments in relation to the policy which included, support for the Council's approach in bringing forward future housing zonings through the consideration of committed housing sites in the main settlements and the clarification thereof and the sequential approach concerning the use of brownfield sites. • A number of respondents, including RSPB NI and a private individual, made a range of comments in relation to the policy which included, concern expressed regarding the threshold for the application of the sequential approach; the approach which it is considered spreads the housing allocation across the Borough on sporadic brownfield sites; and the carrying over of unimplemented housing zonings into a new plan. <p>Affordable Housing</p> <ul style="list-style-type: none"> • A number of respondents including DfI and BCC made a range of comments in relation to the policy which included, support for the commitment to promote balanced communities and strengthen community cohesion; support for the objective to provide affordable housing in line with the need identified by NIHE and the intention to develop supplementary planning guidance. • Clanmill Housing Group and NIFHA support the Council's approach including a threshold-based policy approach and zoning land specifically for affordable housing. Considers that social housing need should be part of a wider mixed tenure development. • Co-Ownership Housing Association support the policy to aid delivery of social housing but the DPS should include a definition of Affordable Housing. • A planning consultant welcomed the approach in considering the need to zone land at Local Policies Plan Stage for Affordable and Social housing, whilst another welcomed the promotion of affordable homes in rural locations, such as Burnside. • DCA express concerns over the NIHE Housing Needs Assessment process. 	
<p>Council Position: Broad support for Policy SP 4: Homes is noted and welcomed. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Homes has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 4 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

The Council has also published two Topic Papers, one on Housing Growth ([DPS-S-005](#)) and one on Affordable Housing ([DPS-S-006](#)), which should be read alongside this Report (please refer to Section 3 of the Council's DfI Submission Section for further details). These provide additional information in support of the Council's approach to these matters in response to the representations made on the DPS.

Policy DM17: Homes in Settlements

Summary of Representations	Associated Reps
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Both broad support and comments were received to the nature and content of Policy DM17: Homes in Settlements. Whilst not exhaustive, the issues raised include:

- Several planning consultants offered broad support for the various provisions of Policy DM 17.1, as well as the commitment to take account of Creating Places Supplementary Planning Guidance.
- A number of respondents including NIHE, BCC and planning consultants made a range of comments in relation to the policy which included, objection to the policy threshold for Lifetime Homes; and that the policy confuses Lifetime Homes with wheelchair accessible units; the threshold differs from neighbouring Councils and the requirement should be brought forward through Building Control regulations.
- A private individual considers that planning authorities have not met their own strategic policies by building houses of similarity on development sites.
- DfI notes the requirement for well-designed high-density proposals at accessible locations in Metropolitan Newtownabbey and towns and considers this appears to suggest that the Council will not set out density requirements for zoned sites.
- A planning consultant offered support for the threshold requirement for the delivery of Affordable Housing, which they considered both reasonable and sound.
- NIHE objected to the level of affordable housing which can be provided at the current policy threshold to meet need.
- A number respondents including The Northern Ireland Federation of Housing Associations (NIFHA) and planning consultants made a range of comments in relation to the affordable housing policy which included: The requirement does not accord with the RDS and SPPS; the level of thresholds identified for affordable housing and problems relating to private sector delivery; it should only be required to deliver affordable housing units where there is an established need identified within the settlement or locality; it's a matter to be tested on selected sites; the policy does not indicate whether the requirement can be offset in other ways; and does not currently provide a clear definition of 'affordable housing', leading to ambiguity.
- A number respondents including NIHE and environmental groups made a range of comments in relation to the policy which included, support for the policy requirement for the

0008, 0024,
0033, 0035,
0036, 0039,
0040, 0041,
0051, 0054,
0057, 0058,
0064, 0066,
0067, 0068,
0069, 0078,
0097, 0099,
0103, 0107,
0116, 0117

<p>delivery of both private and public open space, however, concerns that there is an undersupply at present.</p> <ul style="list-style-type: none"> • RSPB NI considered the LDP should be more ambitious in setting targets for open space to help further sustainable development. • NIHE offered support for the approach to promoting town centre living initiatives through 'Living over the Shop' policy provision. 	
<p>Council Position: Broad support for Policy DM 17: Homes in Settlements is noted and welcomed, particularly from NIHE as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Homes in Settlements has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 17 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought, the Council considers that no change is required.</p> <p>The Council has also published two Topic Papers, one on Housing Growth (DPS-S-005) and one on Affordable Housing (DPS-S-006), which should be read alongside this Report (please refer to Section 3 of the Council's DfI Submission Section for further details). These provide additional information in support of the Council's approach to these matters in response to the representations made on the DPS.</p>	

Policy DM 18: Homes in the Countryside (including DM18 A to DM18 G)	
Summary of Representations	Associated Reps
<p>Both broad support and comments were received to the nature and content of Policy DM18: Homes in the Countryside. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • BCC welcomes the policy provisions and viewed as consistent with the SPPS. • RSPB NI considers that the approach to environmental considerations in the location, siting, and design of dwellings in the countryside identified at POP stage were not continued through to the DPS. • DfI considered that requirements for access identified elsewhere in the DPS should be referenced within the policy. <p>DM 18A</p> <ul style="list-style-type: none"> • Support was received from DfI for Policy DM 18A, with the retention of the ten-year limitation to farm dwellings permissions being particularly welcomed. • DCA made comment on the practical application of the policy which considers that the process for determining if a landowner is actively engaged in farming must be more robust, together with conditions preventing the sale of dwellings. 	<p>0007, 0008, 0015, 0032, 0047, 0051, 0094, 0103, 0107, 0111.</p>

<p>Considers the clustering of farm dwellings with adjacent residential properties is not appropriate.</p> <ul style="list-style-type: none"> • A number of respondents including DfI and a planning consultant made a range of comments in relation to the policy which included, the provision of one dwelling on a farm in a ten-year period is inadequate and not reasonably flexible and there may be genuine circumstances where long established businesses have been interrupted; and the policy does not include a visual linkage test and concern that although DM 18.4 is to be applied in exceptional circumstances, it has potential to undermine the strategic Policy approach to clustering as set out within the SPPS. <p>DM 18B</p> <ul style="list-style-type: none"> • DfI offer general support for the policy, particularly the provision that the replacement dwelling should not have a greater visual impact than the existing. • A number of respondents including DfI, RSPB NI, HED and a planning consultant made a range of comments in relation to the policy which included, in providing exceptional circumstances for a replacement dwelling where only a wall stead remains, has the potential to remove such assets and potential associated archaeological remains; the fact that other categories of building are not eligible for replacement; uncertainty around the definition of 'significant environmental benefit'; and considered lack of importance afforded to biodiversity; and that Policy DM 18B is repetitive of Policies DM 32 and DM 36 and a departure from the regional policy approach for replacement dwellings in the SPPS. <p>DM 18C</p> <ul style="list-style-type: none"> • The policy approach was supported by DfI, with the clarification of a substantial and built-up frontage being particularly welcomed. • A number of planning consultants objected that the provisions of the policy including, concern that the approach for dwellings within a built-up frontage is more stringent than in other Council areas; is too restrictive, fearing that amenity may be compromised and the belief that it was contradictory for the policy to apply a gap no greater than 60 m but also to ensure proposals respect the surrounding character and settlement pattern. <p>DM 18D</p> <ul style="list-style-type: none"> • A planning consultant objected to the provisions of the policy including, concern that provision for dwellings at an existing cluster is more stringent than in other Districts, particularly in terms of excluding 'ancillary buildings' and thus there may be difficulty in achieving the requisite number of buildings. <p>DM 18E</p> <ul style="list-style-type: none"> • DfI suggested that amplification text in relation to dwellings for non-agricultural businesses could clarify that the need to provide improved security is unlikely to be considered as an exceptional circumstance. 	
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<p>DM 18F</p> <ul style="list-style-type: none"> A number of respondents including RSPB NI, a planning consultant and HED made a range of comments in relation to the policy which included, criteria for the conversion of barns is unduly restrictive; does not have regard to the importance of old buildings and underused sites for biodiversity; and is repetitious of the Historic Environment section of the DPS. <p>DM 18G</p> <ul style="list-style-type: none"> NIHE and Co-Ownership Housing Association supported the policy as it will aid the overall delivery of affordable housing within the rural area of the Borough. DfI notes there is no upper limit within the policy for the number of dwellings permitted. 	
<p>Council Position: Broad support for Policy DM 18: Homes in the Countryside is noted and welcomed, particularly from BCC and DfI as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Homes in the Countryside has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 18 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 19: Residential Caravans and Mobile Homes	
Summary of Representations	Relevant Reps
<p>Broad support was received to the nature and content of Policy DM 19: Residential Caravans and Mobile Homes.</p> <ul style="list-style-type: none"> BCC welcomed this policy and its approach was considered consistent with the SPPS. 	0051.
<p>Council Position: Broad support for Policy DM 19: Residential Caravans and Mobile Homes is noted and welcomed from BCC as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Residential Caravans and Mobile Homes has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 19 is sound.</p> <p>No representations sought modifications in relation to this Policy.</p>	

Policy DM 20: Traveller Accommodation	
Summary of Representations	Relevant Reps
<p>Broad support was received to the nature and content of Policy DM 20: Travellers Accommodation. Whilst not exhaustive, the issues raised include:</p>	0008, 0107.

<ul style="list-style-type: none"> NIHE was supportive of the policy as it ensures that the accommodation needs of Travelers are adequately catered for. DfI noted that the policy requires a need to be demonstrated, unlike existing regional Policy HS3 (Amended) Travellers Accommodation. 	
<p>Council Position: Broad support for Policy DM 20: Travellers Accommodation is noted and welcomed, particularly from NIHE as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Traveller Accommodation has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 20 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 21: Specialist Residential Accommodation	
Summary of Representations	Relevant Reps
<p>Broad support was received to the nature and content of Policy DM 21: Specialist Residential Accommodation.</p> <p>NIHE welcome 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, while it was considered that flexibility should be applied in the application of residential design standards due to the specific nature of supported accommodation.</p>	0008.
<p>Council Position: Broad support for Policy DM 21: Specialist Residential Accommodation is noted and welcomed, particularly from NIHE as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Specialist Residential Accommodation has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 21 is sound.</p> <p>No representations sought modifications in relation to this Policy.</p>	

Policy DM 22: Residential Extensions and Alterations	
Summary of Representations	Relevant Reps
<p>Broad support was received to the nature and content of DM 22: Residential Extensions and Alterations. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> NIHE state support for the policy, particularly for the criteria at Policy DM 22.1 in relation to residential extensions. 	0008, 0107.

<ul style="list-style-type: none"> DfI noted that the Council intends to take account of supplementary guidance within Annex A, Addendum to PPS 7. The respondent requested clarification as to whether the existing planning policies and supplementary guidance will be available when the PPSs are removed. 	
<p>Council Position: Broad support for Policy DM 22: Residential Extensions and Alterations is noted and welcomed, particularly from NIHE as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Residential Extensions and Alterations has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 22 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Evidence Paper 6: Housing	
Summary of Representations	Relevant Reps
<p>Several comments were also received relating to Evidence Paper 6: Housing (DPS 012). Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> BCC acknowledges the Council's level of total estimated housing supply, which is well in excess of the Housing Growth Figure and notes its position to use neighbouring authority lands to meet its housing need. A planning consultant welcomes the identification of lands at Niblock Road and confirms the site is active and development will commence and be progressed in the coming years. DfI make various comments in relation to the approach to windfall housing supply, its availability and the methodology involved in the Strategic Urban Capacity Study. 	0051, 0064, 0107.
<p>Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document, rather they seek the inclusion of additional information in one of the accompanying evidence papers. The Council will consider the matter raised when it brings forward any update of its evidence papers.</p>	

Local Policies Plan Issues: Availability of Housing Land Supply	
Summary of Representations	Relevant Reps
<p>Many of the responses to the Homes section of the DPS highlighted issues around the availability and deliverability of existing housing land supply within settlements, in helping to meet the housing allocation over the Plan period.</p>	0033, 0039, 0040, 0041, 0044, 0045, 0052, 0054, 0066, 0067,

<p>Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> Over emphasis on excess of existing housing supply in light of questions over the general deliverability, suitability and viability of housing land. Variance around information presented in Evidence Paper 6 when compared to studies carried out by the objector, as well as a considered lack of evidence base. Issues raised around the availability of existing housing land within the settlements of Antrim, Ballyclare, Ballyrobert, Burnside, Crumlin, Doagh, Dunadry, Metropolitan Newtownabbey, Moneyglass, Parkgate, Randalstown, Templepatrick and Toome, with particular sites identified. 	0068, 0069, 0071, 0072, 0078, 0079, 0080, 0083, 0084, 0089, 0090, 0091, 0092, 0093, 0097, 0104, 0110, 0114.
<p>Council Position: Due to the site-specific nature of these issues, these are matters to be dealt with at the Local Policies Plan stage which will consider site-specific designations/boundaries and the zoning of land.</p> <p>No change to DPS as published is warranted nor is it considered this matter impacts on the soundness of the Plan.</p>	

Local Policies Plan Issues: Lands to be Included for Housing development/zoning	
Summary of Representations	Relevant Reps
<p>A considerable number of responses to the Homes section of the DPS advocated specific areas of land to be considered for future housing development or zoning. Many of these contained detailed analysis of the particular site, including infrastructure, environmental and landscape attributes.</p> <p>Various lands for housing development were identified relating to the settlements of:</p> <ul style="list-style-type: none"> Antrim, Ballyclare, Ballynure, Ballyrobert, Burnside, Crumlin, Doagh, Dunadry, Greenisland, Metropolitan Newtownabbey, Moneyglass, Parkgate, Randalstown, Roughfort, Straid, Templepatrick, Tildarg and Toome. 	0006, 0022, 0024, 0027, 0028, 0031, 0033, 0035, 0038, 0039, 0040, 0041, 0044, 0045, 0052, 0065, 0068, 0069, 0071, 0072, 0078, 0079, 0084, 0089, 0090, 0091, 0092, 0093, 0097, 0099, 0104, 0105, 0109, 0110, 0114, 0117, 0120.
<p>Council Position: Due to the site-specific nature of these issues, these are matters to be dealt with at the Local Policies Plan stage which will consider site-specific designations/boundaries and the zoning of land.</p> <p>No change to DPS as published is warranted nor is it considered this matter impacts on the soundness of the Plan.</p>	

Community infrastructure

Policy SP 5: Community Infrastructure		
Summary of Representations	Relevant Reps	
<p>Broad support was received for the nature and content of Policy SP 5: Community Infrastructure from a range of the Council's statutory partners including BCC, DfE and the NIHE, local environmental organisations (AADAA and SMWT) and sporting organisations. Support was provided for the promotion of accessible community infrastructure and the protection of existing public open space. Whilst not exhaustive, the main issues raised include:</p> <ul style="list-style-type: none"> • BCC: Welcomes the Council's flexible, cross-boundary approach to cemetery and crematoria provision. • DfE: Welcomes the Council's commitment to bring forward land allocations in the Local Policies Plan to meet the needs identified by education authorities. • NIHE: Consider open space as important in the creation of sustainable communities, as it greatly benefits people's health and wellbeing and encourages community cohesion. • NIHE: Regarding green infrastructure, considers that new development should conserve wildlife habitat, existing trees, and quality vegetation, and promote biodiversity. Considers good quality green infrastructure can help to encourage healthier lifestyles. • NIHE: Support for the Council's 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. • NIHE: Consider the planting of native species in housing development should be encouraged, including the promotion of tree lined streets. • DfE: Welcomes the Council's commitment to bring forward land allocations in the Local Policies Plan to meet the needs identified by education authorities. • The Mae Murray Foundation: Welcomes the Plan's reference to the role of the community and voluntary sector in service provision. • AADAA and SMWT: Considers the Plan should recognise the Six Mile Water and its tributaries as important community assets. 	0008, 0018, 0025, 0036, 0051, 0057, 0097, 0098	
<p>Council Position: Broad support for Policy SP 5: Community Infrastructure is noted and welcomed, particularly from BCC, DfE, and the NIHE as the Council's statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and Community Infrastructure has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 5 is sound.</p> <p>No representations sought modifications in relation to this Policy.</p>		

Policy DM 23: Protection of Open Space	
Summary of Representations	Relevant Reps
<p>Broad support was received for the nature and content of Policy DM 23: Protection of Open Space from the Council's strategic partners, BCC and DfI (Strategic Planning), from a local charity, The Belfast Hills Partnership (BHP) and a private individual. Whilst not exhaustive, the main issues raised include:</p> <ul style="list-style-type: none"> BCC: Consider the Council's policy approach to the protection of open space is consistent with regional planning policy and the approach as set out in BCC's DPS. BHP: Supports the Plan's policy approach to the protection of open space, regardless of whether it has access or not. Considers there are significant aesthetic, biodiversity, landscape, and natural capital benefits from open space including those areas with no public access. <p>Whilst Policy DM 23 received support, several detailed policy wording changes were recommended. These include:</p> <ul style="list-style-type: none"> NIHE: Supports the Plan's interpretation that social housing is a significant community benefit. Considers 'social housing' should be termed as 'affordable housing'. NIHE: A specific request for guidance on the implementation of DM 23.2 exceptions test (a) and (b) regarding the retention of open space, and in particular, the retention of the NIHE and DoE joint protocol (to provide guidance for all stakeholders on the Council's approach to policy implementation). UU: Consider the Open Space designation and associated policy for its protection should not be applied to existing open space areas at Ulster University, Jordanstown as it could hinder the redevelopment of the University Masterplan area. Kickhams GAC Creggan (KC) and BHP: KC welcomes the examples of open space provided for in the Plan's Amplification section. Requests that this is expanded to include the protection of playing field facilities, the accommodation of ancillary changing room facilities and Local Nature Reserves (BHP). 	0008, 0018, 0036, 0051, 0057, 0060, 0099, 0107
<p>Council Position: Broad support for Policy DM 23: Protection of Open Space is noted and welcomed, particularly from BCC and DfI (Strategic Planning) as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to the Protection of Open Space has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 23 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Policy DM 24: Community Facilities	
Summary of Representations	Relevant Reps
<p>Broad support was received for the nature and content of Policy DM 24: Community Facilities from two of the Council's statutory partners, the NIHE and DfE, and a private individual. In particular, the NIHE supports in principle, the introduction of developer contributions towards the demand arising from new or enhanced community infrastructure because of new development.</p> <p>Whilst Policy DM 24 received support, several detailed policy wording changes were recommended. These include:</p> <ul style="list-style-type: none"> • RSPB NI: Consider the policy should be cross-referenced to other policies within the Plan to meet the policy requirements of the SPPS with regards to development in the countryside. • A call for flexibility to facilitate rural community needs, where proposals by the local rural population may not be of the scale and nature to be deemed acceptable for development outside settlements. • A neutral comment was received from BCC who consider the Council's policy approach is aligned with regional policy which ensures appropriate consideration of any wider regional requirements when taking decisions on trans-boundary community facilities. • Whilst DfI (Strategic Planning) notes the Council's definition of 'community facilities' to include sports and recreation facilities, it objects to the Council's interpretation and policy consideration of intensive sports facilities. DfI considers that the policy supports this type of development within the countryside and is therefore not in line with regional policy. 	0008, 0025, 0040, 0097, 0098, 0103, 0107
<p>Council Position: Broad support for Policy DM 24: Community Facilities is noted and welcomed, particularly from DfE and the NIHE as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Community Facilities has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 24 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Local Policies Plan Issues: Lands to be Identified for Community Facilities	
Summary of Representations	Relevant Reps
<p>Two private clients have offered the inclusion of lands for community facilities.</p> <p>DE: Welcomes the Council's commitment to bring forward land allocations in the Local Policies Plan to meet the needs identified by education authorities in the Borough.</p>	0097, 0098

<p>DE: Subject lands are offered by a private client, with support from DE, for educational use at the Hightown Road, Newtownabbey (Gaelscoil Eanna) at the Local Policies Plan stage of the LDP.</p> <p>A private individual has offered the inclusion of lands at Parkgate for community facilities.</p>	
<p>Council Position: Due to the site-specific nature of these issues, these are matters to be dealt with at the Local Policies Plan stage which will consider site-specific designation/boundaries and the zoning of land.</p> <p>No change to the DPS as published is warranted nor is it considered this matter impacts on the soundness of the Plan.</p>	

Placemaking and Good Design

Policy SP 6: Placemaking and Good Design	
Summary of Representations	Relevant Reps
<p>Both broad support and objections were received from a range of respondents including environmental groups, neighbouring Councils, government bodies and planning consultants to the nature and content of Policy SP 6: Placemaking and Good Design. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • Support received from ADAA and SMWT for the objectives related to the policy which are considered excellent, whilst making a general comment regarding historical planning approvals. • Private individuals suggested the Plan could do more to highlight the importance of high quality and visually attractive areas which are environmentally sustainable. • BCC noted the positive approach to the policy and NIHE welcomes the adoption of the Placemaking approach to development, while supporting the requirement for submission of Design and Access Statements, however, would like to see the requirement extended. • DoJ welcomes the emphasis in creating shared space, keeping community safe and reducing crime. • NIHE welcomes the Positive Planning Note: Adding Value. • It was considered that 'Landscape Architects' should be added to the list of those groups with which the Council will work in partnership, while NIEA requests that explicit reference is made to 'seascape'. • DfI considered that policies relating to roads and access requirements should be cross referenced within the Policy. 	0008, 0029, 0036, 0051, 0057, 0058, 0094, 0102, 0107.
<p>Council Position: Broad support for Policy SP 6: Placemaking and Good Design is noted and welcomed, particularly from NIHE, BCC and DoJ as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Placemaking and Good Design has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 6 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Policy DM 25: Urban Design	
Summary of Representations	Relevant Reps
<p>Broad support was received from a range of respondents including government bodies, neighbouring Councils and environmental groups to the nature and content of Policy DM 25: Urban Design. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> ADAA, SMWT and respondents from within the development industry are supportive of Policy DM 25, whilst NIHE welcomes policies DM 25.1 and DM 25.2, and paragraph 9.17, however would like to see more detail added to require developers to demonstrate that they have taken steps to reduce energy consumption and incorporate sustainable design solutions. BCC welcomes policy however is concerned the policy requirements may represent the full extent of any future supplementary planning guidance. RSPB NI welcomed the inclusion of landscape and biodiversity within the policy, while expressing the desire to see supplementary planning guidance. They also suggest the LDP should be more ambitious in furthering biodiversity, consistent with a range of strategies. One individual expressed the desire to see new business/industrial parks designed in the same fashion as Antrim Technology Park, whilst others raise concerns regarding design and layout issues within recent housing schemes in the Borough. DfI suggests cross referencing the policy with DM 17(a), DM 10, DM 11, and DM 12. 	0008, 0036, 0051, 0057, 0058, 0077, 0097, 0099, 0103, 0107.
<p>Council Position: Broad support for Policy DM 25: Urban Design is noted and welcomed, particularly from NIHE and BCC as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Urban Design has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 25 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 26: Shopfront Design	
Summary of Representations	Relevant Reps
<p>Comments were received to the nature and content of Policy DM 26: Shopfront Design from ADAA and the SMWT. It is considered that the policy in relation to shopfronts is not clear and does not respond adequately to the plethora of plastic signage across the Borough.</p>	0036, 0057.
<p>Council Position: The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Shopfront</p>	

Design has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 26 is sound.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

Policy DM 27: Rural Design and Character

Summary of Representations

Broad support was received from a range of respondents including government bodies and environmental groups on the nature and content of Policy DM 27: Rural Design and Character. Whilst not exhaustive, the issues raised include:

- RSPB NI indicates that the Policy should include a requirement to achieve no net loss of biodiversity and recommends the inclusion of additional policy text.
- DfI welcomes the Council's approach but consider that policy should make clear that it relates to development permissible in accordance with policies for homes/economic development in the countryside.

Council Position: Broad support for Policy DM 27: Rural Design and Character is noted and welcomed, particularly from DfI as a statutory consultee. The Council considers the policy as drafted is appropriate and reasonable and the approach to Rural Design and Character has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 27 is sound.

Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in [Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required

Relevant Reps

0103, 0107.

Policy DM 28: Amenity Impact

Summary of Representations

Comments were received from DfI to the nature and content of Policy DM 28: Amenity Impact. The issues raised include:

- It was suggested the Council consider other impacts arising from the type of development, for example shadow flicker.
- The Council should consider the need for consistency with other parts of the DPS in referring to amenity impacts.

Council Position: The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Amenity

Relevant Reps

0107.

Impact has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 28 is sound.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

Policy DM 29: Advertisements	
Summary of Representations	Relevant Reps
<p>Comments were received from government departments to the nature and content of Policy DM 29: Advertisements. The issues raised include:</p> <ul style="list-style-type: none"> HED considers that the policy does not fully reflect the SPPS in the hierarchy approach to the application of the policy and suggests wording amendments accordingly. DfI notes that the Council intends to rely on the guidance set out in Annex of PPS 17 and the Council should note that upon adoption of the Plan the PPS will cease to have effect and are not available to refer to. DfI considers that the Policy does not refer to roads safety concerns. 	0032, 0107.
<p>Council Position: The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Advertisements has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 29 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Evidence Paper 21: Placemaking and Good Design	
Summary of Representations	Associated Reps
<p>A comment was received from HED relating to Evidence Paper 21: Placemaking and Good Design. HED 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.</p>	0032.
<p>Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document, rather they seek the inclusion of additional information in one of the accompanying evidence papers. The Council will consider the matter raised when it brings forward any update of its evidence papers.</p>	

Historic Environment

Policy SP 7: Historic Environment	
Summary of Representations	Relevant Reps
<p>Both broad support and objections were received from a range of respondents including environmental groups, government departments and local environmental groups to the nature and content of Policy SP 7 Historic Environment. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • Support for the policies which protect the built environment and heritage was received from NIHE, while ADAA and SMWT supported the policies and the associated objectives. • ADAA and SMWT considered that the importance of the Sixmilewater Valley, particularly the natural and built environment is inadequately highlighted within the section. • 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. 	0008, 0009, 0036, 0057.
<p>Council Position: Broad support for Policy SP 7: Historic Environment is noted and welcomed, particularly from NIHE as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Historic Environment has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 7 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 30: Archaeology	
Summary of Representations	Relevant Reps
<p>Broad support with an amendment to text was received from HED to the nature and content of Policy DM 30: Archaeology. HED considers the amplification text for Policy DM 30 makes no reference to Areas of Archaeological Potential to which SPPS 6.29 refers.</p>	0032.
<p>Council Position: Broad support for Policy DM 30: Archaeology is noted and welcomed, particularly from HED as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Archaeology has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 30 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 31: Historic Parks, Gardens and Demesnes.	
Summary of Representations	Relevant Reps
<p>Objections were received from a range of respondents including government departments and planning consultants to the nature and content of Policy DM 31: Historic Park, Gardens and Demesnes. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • HED and DfI included a range of comments which considered that the policy is unsound due to the inclusion of the Policy DM 31(b) exception, which it is claimed introduces a lesser policy test than envisaged under the SPPS; that there is contradiction between Policy DM 31.1(a) and (b), as well as between DM 31.1(b) and SP 9.2(c). • A planning consultant considers that account should be taken when considering the impact of development proposals on historic places, which may have been redesigned and reconfigured overtime. 	0032, 0094, 0107.
<p>Council Position: The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Historic Parks, Gardens and Demesnes has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 31 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 32: Listed Buildings	
Summary of Representations	Relevant Reps
<p>Both broad support and objections were received from HED and RSPB NI to the nature and content of Policy DM 32: Listed Buildings, the issues raised include:</p> <ul style="list-style-type: none"> • HED welcomes the inclusion of 'Statement of Justification' to be submitted with applications which impact listed buildings and their settings, however the title be changed to 'Statement of Significance'. • HED included a comment on the position of clarification para. 10.33 and suggested amendment to text. • RSPB NI considers the Policy has no regard to the importance of old buildings & underused sites for biodiversity. 	0032, 0103.
<p>Council Position: Broad support for Policy DM 32: Listed Buildings from HED, as a statutory consultee is noted and welcomed. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Listed Buildings has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 32 is sound.</p>	

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.	
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Policy DM 33: Conservation Areas

Summary of Representations

Relevant Reprs

Objections were received from government departments to the nature and content of Policy DM 33: Conservation Areas. Whilst not exhaustive, the issues raised include:

- HED included comments on the provisions of the policy including, perceived difference in emphasis between parts of the policy; conflict between elements of the policy; and aspects of the Policy are not in alignment with the SPPS due to issues including wording order, policy hierarchy and policy tests.
- DfI considers the policy 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'. Also consider that text in para. 10.46 should be added to the policy box.

0032, 0107.

Council Position: The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Conservation Areas has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 33 is sound.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

Policy DM 34: Areas of Townscape Character

Summary of Representations

Relevant Reprs

There were no representations made in relation to this policy.

n/a

Policy DM 35: Enabling Development

Summary of Representations

Relevant Reprs

Broad support was received from elements of the development industry to the nature and content of DM 35: Enabling Development. Whilst not exhaustive, the issues raised include:

- Policy DM 35 is welcomed as economic development and tourism can provide a financial lifeline for such Historic Park Garden and Demesne estates.
- Supports the policy on Enabling Development however suggests that the protection and refurbishment of a heritage asset,

0094, 0115.

particularly if it's listed, should be considered sufficient public benefit to outweigh the departure from normal planning policy.	
<p>Council Position: Broad support for Policy DM 35: Enabling Development is noted and welcomed. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Enabling Development has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 35 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 36: Vernacular and Locally Important Buildings	
Summary of Representations	Relevant Reps
<p>Objections were received from HED and RSPB NI to the nature and content of DM 36: Vernacular and Locally Important Buildings. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> HED considers that the policy and clarification text does not take sufficient account of the SPPS, as well as concerns with detailed policy wording. RSPB NI considers the policy has no regard to the importance of old buildings and underused sites for biodiversity. 	0032, 0103.
<p>Council Position: The Council considers that the proposed policy as appropriate and reasonable and that the approach to Vernacular and Locally Important Buildings has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 36 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Evidence Paper 7: Historic Environment	
Summary of Representations	Relevant Reps
<p>Several comments were also received from government departments relating to Evidence Paper 7: Historic Environment (DPS 013). HED, NIEA and DfI made several detailed wording change recommendations in relation to the Evidence Paper.</p>	0032, 0102, 0107.
<p>Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document, rather they seek the inclusion of additional information in one of the accompanying evidence papers. The Council will consider the matter raised when it brings forward any update of its evidence papers.</p>	

Natural Heritage

Strategic Policy SP 8: Natural Heritage	
Summary of Representations	Relevant Reps
<p>Both broad support and objections were received to the nature and content of Strategic Policy SP 8 Natural Heritage. Support was received from several of the Council's strategic partners including Armagh, Banbridge and Craigavon Borough Council (ABCBC), Belfast City Council (BCC), Mid Ulster District Council (MUDC), NIEA Natural Environment Division (NED), the Northern Ireland housing Executive (NIHE), the Antrim and District Angling Association (ADAA) and The Royal Society for the Protection of Birds NI (RSPB NI). Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • ABCBC: Welcomes active engagement with the Council on cross boundary issues and specifically, Lough Neagh and Lough Beg. • BCC: Considers Policy SP 8 as consistent with the SPPS and welcomes the protection of important cross boundary assets such as Belfast Lough. Requests this asset to be mutually considered at the Local Policies Plan stage of the LDP process. • NED: Welcomes the Council's partnership approach to protect, conserve, and promote the enhancement and restoration of the diversity of the Borough's natural heritage. NED welcomes the Council's intention to bring forward Strategic Landscape Policy Areas, Local Landscape Policy Areas (LLPAs), Sites of Local Nature Conservation Interest (SLNCl) and a Coastal Policy Area (CPA) at the Local Policies Plan stage. • NIHE: Supportive of planning policies that protect the Borough's natural heritage assets and resources. • RSPB NI: Requests that the Plan should ensure that the cumulative effects of development are considered and recommended an additional bullet point at Policy SP 8.2. • Whilst the policy received broad support, several detailed policy wording changes were recommended. These related to the referencing within policy to the 'Lawton Principles' (RSPB NI) and to coastal and seascape in order to ensure compliance with relevant marine legislation (NIEA, NED), a request for policies to be more objective in nature with clear references to the Borough's aquatic environment, and to include a policy reference to the Six Mile Water Valley (ADAA). The RSPB NI requested that the policy should refer to the 'precautionary principle' when considering the impacts of a proposed development on national or international significant landscape or natural heritage resources. <p>Habitats, Species and Biodiversity Respondents were silent in offering any objection to the nature and content of Strategic Policy 8.3 Habitats, Species and Biodiversity.</p> <p>Landscape and Coast Respondents were silent in offering any objection to the nature and content of Strategic Policy 8.4 on Landscape and Coast.</p>	<p>0002, 0008, 0010, 0019, 0020, 0036, 0051, 0057, 0058, 0060, 0074, 0077, 0094, 0099, 0102, 0103, 0107.</p>

Strategic Landscape Policy Areas

Both broad support and objections were received to the nature and content of Policy SP 8.5-8.6 on Strategic Landscape Policy Areas (SPLA). MUDC welcomes the designation of Lough Neagh and Lough Beg as SLPAs and is supportive of the associated policies. MUDC considers there to be no perceived conflict in relation to its own Special Countryside Area designation. Policy support was also received from DADRA and specifically to the Council's policy approach for the 7 no. SLPAs proposed including Drumadarragh Hill.

Whilst the policy received broad support, several issues were raised as well as detailed policy wording changes. These include:

- AADAA: Requests that the Six Mile Valley is designated as a SLPA.
- Belfast Hills Partnership (BHP): Considers the designation Areas of High Scenic Value (AHSV) should be retained in addition to the use of Landscape Character Areas.
- DADRA: Requests the Council takes a more robust approach to the claimed economic benefits of development proposals in SLPAs.
- MEABC notes that the Council has chosen not to delineate the boundaries for strategic spatial designations in the countryside in the DPS.
- Consideration that the Council's policy approach is overly restrictive in Lough Neagh as it is already protected by extant SAC/ASSI/Ramsar designations. Recommends that the Council actively promotes access to Lough Neagh for tourist activity.

Local Landscape Policy Areas

Broad support was received to the nature and content of Strategic Policy SP 8.7-8.8 on Local Landscape Policy Areas (LLPA) from DADRA and The Six Mile Water Trust (SMWT).

Whilst the policy received support, detailed policy wording changes were recommended by both AADAA and the SMWT. These relate to the Plan specifically referring to riverbanks and individual trees.

DfI (Strategic Planning) noted that the Council may need to consider transitional arrangements in relation to proposed cross boundary LLPAs.

Coastal Policy Areas

Respondents were silent in offering any objection to the nature and content of Strategic Policy 8.9 on Coastal Policy Areas.

Council Position: Broad support for Policy SP 8: Natural Heritage is noted and welcomed, particularly from ABCBC, BCC, NIEA (NED), NIHE and the RSPB NI as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Natural Heritage has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 8 is sound.

Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in [Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required.

Policy DM 37: Designated Sites of Nature Conservation Importance	
Summary of Representations	Relevant Reps
<p>Broad support was received from BCC, DE, DfI (Strategic Planning) and NIEA Natural Environment Division (NED) for the nature and content of Policy DM 37 Designated Sites of Nature Conservation Importance.</p> <p>Whilst the policy received support, detailed policy wording changes were recommended by DfI (Strategic Planning) and NED. These relate to perceived policy consistency with the extant policy position set out in PPS 2 Nature Conservation Policy NH 1 and the SPPS.</p>	0051, 0098, 0102, 0107
<p>Council Position: Broad support for Policy DM 37: Designated Sites of Nature Conservation Importance is noted and welcomed, particularly from BCC, DE, DfI (Strategic Planning), and NED as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Designated Sites of Nature Conservation Importance has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 37 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

Policy DM 38: Protected Species	
Summary of Representations	Relevant Reps
<p>Broad support was received from BCC, DfI (Strategic Planning) and NIEA Natural Environment Division (NED) for the nature and content of Policy DM 38 Protected Species. Whilst the policy received support from the Council's key statutory partners, an objection was received from RSPB NI in respect of policy wording for Policy DM 38.1 regarding European Protected Species and compliance with the NI Habitats Directive.</p> <p>Detailed policy wording changes were recommended by DfI (Strategic Planning) and NED. These relate to Policy DM 38.1 (b) European Protected Species and the perceived 'widening' of the exceptions test, and the policy requirement for 'evidence' of protected species to determine the need for a developer to undertake a protected species survey in compliance with the SPPS. NED recommended the word 'evidence' is amended to 'potential'.</p>	0051, 0102, 0103, 0107
<p>Council Position: Broad support for Policy DM 38: Protected Species is noted and welcomed, particularly from BCC, DfI (Strategic Planning), and NIEA (NED) as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Protected Species has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 38 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in Section 7 of this</p>	

[Report](#). In relation to the other modifications sought the Council considers that no change is required.

Policy DM 39: Habitats, Species & Features of Natural Heritage Importance

Summary of Representations

Relevant Reps

Broad support was received from BCC, DE, NED, DfI, BHP and the WT for the nature and content of Policy DM 39 Habitats, Species & Features of Natural Heritage Importance.

0051, 0060, 0098, 0102, 0107, 0112

Whilst the policy received broad support from the Council's key statutory partners and charities, detailed policy wording changes were recommended by DfI (Strategic Planning), NED, BHP and WT. These relate to the Plan's perceived consistency with extant policy in PPS 2 Nature Conservation and the SPPS as well as a request that 'Plantations on Ancient Woodland Sites' (PAWS) be included within Policy DM 39.1.

Council Position: Broad support for Policy DM 39: Habitats, Species and Features of Natural Heritage is noted and welcomed, particularly from BCC, DE, DfI (Strategic Planning), and NED as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Habitats, Species and Features of Natural Heritage has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 39 is sound.

Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in [Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required.

Policy DM 40: Landscape Protection

Summary of Representations

Relevant Reps

Both broad support and objections were received to the nature and content of Policy DM 40 Landscape Protection. Support was received from a range of the Council's key statutory partners including ABCBC, BCC, MUDC, and local associations/trusts. Whilst not exhaustive, the issues raised include:

0010, 0019, 0036, 0051, 0057, 0060, 0094, 0099, 0102, 0103, 0107

- Support for the inclusion of Carmoney Hill, Newtownabbey as a SLPA.
- BCC: Support for (1) The protection of important upland hills and mountains for their setting and cultural/historic qualities, (2) The recognition of the need to protect landscape qualities and nature conservation attributes of the Belfast lough coastline by protecting the urbanised coastal setting and enhancing the natural environment.

<ul style="list-style-type: none"> • To support proposed policy with specific guidance and explanatory notes. • One objection was received relating to the inclusion of policy wording 'strict control'. Considers this could potentially prevent sympathetic development and considers the term 'low intensity recreational or tourism use' as vague. <p>Whilst the policy received broad support, several detailed policy wording changes were recommended by ABCBC, NED, RSPB NI and BHP. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • To consider 'landscape' as a recreational asset. • A proportionate LVIA to be required for all development within a defined landscape setting. • To safeguard against commercial forestry on Carnmoney Hill and within the environs of Lough Neagh and Lough Beg. • RSPB NI: To include a 1km landscape buffer zone around Lough Neagh and Lough Beg. • MUDC: Clarity required whether a regional need for mineral development is required for the Lough Neagh and Beg SLPA. 	
<p>Council Position: Broad support for Policy DM 40: Landscape Protection is noted and welcomed, particularly from ABCBC, BCC, and MUDC as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Landscape Protection has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 40 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Policy DM 41: Coastal Protection	
Summary of Representations	Relevant Reps
<p>Broad support was received from BCC for the nature and content Coastal Protection. BCC recognises the need to protect the undeveloped coast from inappropriate development and together with DfI (Strategic Planning) in its response, highlight the need for a cross boundary policy approach in respect of Belfast Lough.</p> <p>NED considers the wording of Policy DM 41 applies only to the inter-tidal area and requests policy wording consistent with the UK Marine Policy Statement and the emerging Marine Plan for Northern Ireland.</p>	0013, 0051, 0107
<p>Council Position: Broad support for Policy DM 41: Coastal Protection is noted and welcomed, particularly from BCC as a statutory consultee. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Coastal Protection has taken</p>	

account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 41 is sound.

Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in [Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required.

Policy DM 42: Trees and Development

Summary of Representations

Relevant Reps

Broad support and one objection were received for the nature and content of Policy DM 42: Trees and Development. Support was received from BCC, DfI (Strategic Planning), NIHE, and local environmental organisations, AADAA and the SMWT.

0008, 0036, 0051, 0057, 0058, 0102, 0106, 0107, 0112

- Respondents supported the inclusion of native hedgerows in policy wording, the Plan's requirement for supplementary replacement tree planting and requested strict observance of relevant British Standards in relation to trees and development.
- NI Electricity Networks considers Policy DM 42.3 as impracticable in the context of the organisation's legal obligations and current working practices. It is considered the replacement of hedgerows and trees is often restricted by overhead cables and underground lines.

Whilst the policy received broad support, several detailed policy wording changes were requested. These relate to the interpretation of policy, a request for new development to encourage tree lined streets, the protection of veteran trees, and a request for the introduction of an amenity tree evaluation system.

Council Position: Broad support for Policy DM 42: Trees and Development is noted and welcomed, particularly from BCC, DfI (Strategic Planning), and NIHE as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Trees and Development has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 42 is sound.

Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in [Section 7 of this Report](#). In relation to the other modifications sought the Council considers that no change is required.

Evidence Paper 16 – Landscape Character Assessment; Evidence Paper 17 – Natural Heritage; and Evidence Paper 19 – Coast	
Summary of Representations	Relevant Reps
<p>Evidence paper 16 – Landscape Character Assessment (DPS 022)</p> <p>Broad support was received from NED who consider the LCA methodology is sound and practical for the determination of development proposals in the future. No objections were received. Several detailed wording changes were requested, for example to include a reference to marine policy documents and legislation.</p> <p>No objections or significant issues were raised regarding Evidence Paper 17 – Natural Heritage (DPS 023) and Evidence Paper 19 – Coast (DPS 024).</p> <p>Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document, rather they seek the inclusion of additional information in one of the accompanying evidence papers. The Council will consider the matters raised when it brings forward any update of its evidence papers.</p>	0102, 0107

Local Policies Plan Issue	
Summary of Representations	Relevant Reps
<p>A detailed policy wording change was requested by the Ulster University. It suggested that the Council review the draft Belfast Metropolitan Area Plan (BMAP) Local Landscape Policy Area designation MNY 46 in order that it would only cover the stream corridors that run through the Jordanstown campus, rather than applying to the entire campus site.</p> <p>Whilst NED supports the written text of Policy SP 8.6, it has expressed concern regarding how the proposed SLPA for Lough Neagh and Lough Beg shorelines have been visually represented on Figure 12; 'Natural Heritage Assets within our Borough' (page 240 of the DPS).</p> <p>The BHP have requested the retention of existing 'Areas of High Scenic Value' (AOHSV), in addition to the use of Landscape Character Areas.</p> <p>Council Position: Due to the site-specific nature of these issues, these are matters to be dealt with at the Local Policies Plan stage which will consider site-specific designation/ boundaries and the zoning of land.</p> <p>No change to DPS as published is warranted nor is it considered this matter impacts on the soundness of the Plan.</p>	0035, 0060, 0102

Natural Resources

Strategic Policy SP 9: Natural Resources	
Summary of Representations	Relevant Reps
<p>Broad support was received from the NIHE, DfE (Minerals and Petroleum Branch) and the Minerals Product Association NI Ltd (MPANI) for the nature and content of Strategic Policy 9: Natural Resources. Support was identified for:</p> <ul style="list-style-type: none"> • Maximising opportunities to develop renewable energy generation facilities in appropriate locations. • The promotion of low carbon lifestyles and for the development of a diverse range of renewable energy technologies. • The Council's position not to designate an Area of Mineral Constraint within the LDP. • The Council's active and ongoing engagement with the mineral's industry. <p>Whilst not exhaustive, the range of issues raised include:</p> <p>Minerals</p> <ul style="list-style-type: none"> • DfE: Welcomes the recognition of the economic importance of mineral development, whilst seeking to ensure potential adverse environmental impacts are mitigated. The identification and protection of important mineral deposits is welcomed. • Whilst no objections were received from MUDC, RSPB NI has objected to Policy DM 9.2 as it notes that a presumption against new or extended planning permissions for peat extraction have not been included within the DPS. RSPB NI points out that not all peatland falls within a designated site. • MPANI consider the DPS fails to recognise the significant contribution that the minerals sector makes to rates income. <p>Mineral Reserves</p> <ul style="list-style-type: none"> • DfE broadly supports and welcomes the Council's continued safeguarding of the proven strategic lignite reserve to the south west of Crumlin. <p>Whilst Strategic Policy SP 9 received broad support, several detailed policy wording changes were also recommended. These relate to the preferred locations for renewable energy technologies (Policy SP 9.4) and a request for a presumption against planning approval for peat extraction. DfI (Planning) notes the Council's position regarding fracking.</p>	0008, 0009, 0019, 0030, 0034, 0087, 0103, 0107
<p>Council Position: Broad support for Policy SP 9: Natural Resources is noted and welcomed, particularly from DfE (Minerals and Petroleum Branch) as a statutory consultee. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Natural Resources has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 9 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there are several where the Council is open to minor change for the purposes of clarification, should the Independent</p>	

Examination consider it beneficial. These are set out in **Section 7 of this Report**. In relation to the other modifications sought the Council considers that no change is required.

DM 43: Minerals Development

Summary of Representations

Relevant Reps

Broad support was received from DfE (Minerals and Petroleum Branch), DfI (Strategic Planning) and representatives from the local mineral industry for the nature and content of Policy DM 43 Minerals Development. Whilst not exhaustive, the range of issues raised include:

0009, 0019,
0034, 0053,
0087, 0103,
0107

- Support for the Council's proposed flexible and balanced policy approach to include site restoration, mine waste plans, instability reports and consideration of cumulative impacts.
- Support for the parameters identified in Policy DM 43.2 (a) – (l) regarding proposals for new mineral workings or the extension of existing workings.
- DfI (Strategic Planning): Support for the inclusion of the cumulative impacts criterion in Policy DM 43.2 (f).
- RSPB NI: Highlighted the need for a framework for restoration of peatlands to include regular site inspections to completion (Sluggan Moss, Randalstown is identified as a good practice example).

Whilst Policy DM 43 received broad support, several detailed policy wording changes were recommended. These relate to a request for the inclusion of policy wording which supports the sympathetic redevelopment of redundant quarry sites and landfill developments for mixed use development, and a request to require developers to include details of sustainable restoration measures, including enhancement of biodiversity wherever possible.

No objections were received to Policy DM 43.

Council Position: Broad support for Policy DM 43: Minerals Development is noted and welcomed particularly from DfE (Minerals and Petroleum Branch) and DfI (Strategic Planning) as statutory consultees. The Council welcomes the support from key statutory partners and representatives from the minerals industry sector and will continue to positively engage with them on issues of mutual interest as the LDP progresses. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Minerals Development has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 43 is sound.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

DM 44: Mineral Reserve Policy Area	
Summary of Representations	Relevant Reps
<p>Support was received from DfE (Minerals and Petroleum Branch) and representatives from the local mineral industry for the nature and content of Policy DM 44 Mineral Reserve Policy Area. Respondents indicated their support for the protection of identified mineral reserves, and specifically, the Council's continued protection of the identified lignite reserve at Crumlin.</p> <p>Whilst Policy DM 44 received support, several detailed policy wording changes were also recommended. These relate to:</p> <ul style="list-style-type: none"> Concern that Policy DM 44 seeks only to safeguard mineral reserves and is not extended to include mineral processing sites (for example, Ballyginiff Quay, Crumlin). Requests that a 250 metre safeguarding area around the quay together with a policy presumption in favour of ancillary development associated with the operation of the processing site. Considers that as the fossil record of the identified lignite reserve at Crumlin is not fully known, Policy DM 44 could inhibit potential farm diversification or tourism-led development proposals. <p>No objections were received to Policy DM 44.</p>	0009, 0010, 0034, 0061, 0094, 0107
<p>Council Position: General support for Policy DM 44: Minerals Reserve Policy Area is noted and welcomed particularly from DfE (Minerals and Petroleum Branch) as statutory consultee. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Mineral Reserve Policy Area has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 44 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

DM 45: Renewable Energy Development	
Summary of Representations	Relevant Reps
<p>Broad support and some objections were received from a range of the Council's statutory and strategic partners, representatives from the local renewable energy sector, and a local community group to the nature and content of Policy DM 45: Renewable Energy Development.</p> <p>Whilst not exhaustive, the range of support raised include:</p> <ul style="list-style-type: none"> RSPB NI: Support for the Spatial Framework for wind energy development (Policy DM 45.5). NIHE: Supports maximising the Council's opportunities to develop renewable energy generation facilities in appropriate locations. DfE (Central Management Branch): Welcomes the Council's recognition that the greater use of renewable energy will create 	0002, 0008, 0009, 0030, 0032, 0036, 0057, 0060, 0074, 0102, 0103, 0106, 0107, 0113

<p>a more dependable energy mix, reducing dependence on fossil fuels. Supports the Council's approach to the decommissioning of redundant renewable infrastructure.</p> <p>Whilst Policy DM 45 received broad support, several policy wording changes were also recommended. Whilst not exhaustive these include, policy alignment with the SPPS, a request for the Council to provide greater clarity on the repowering, decommissioning and restoration of renewable energy (RSPB NI), and the Plan's failure to take account of ongoing technology development in the wind energy sector (DfE, Central Management Branch).</p> <p>The range of objections received include:</p> <ul style="list-style-type: none"> • NED: Concern that the policy is not consistent with the SPPS. • RSPB NI: Regarding the mitigation of new renewable energy development, where required, policy wording should address compensatory measures from the developer. • DADRA: Considers policy wording lacks a sufficient evidence base and requests a minimum separation distance of 500 metres for all wind turbines from occupied properties. 	
<p>Council Position: General support for Policy DM 45: Renewable Energy Development is noted and welcomed particularly from DfE (Central Management Branch) and NIHE, as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Renewable Energy Development has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 45 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. These are set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

Evidence Paper 12 – Minerals, Evidence Paper 13 – Renewables	
Summary of Representations	Relevant Reps
<p>Evidence Paper 12 – Minerals (DPS 018)</p> <p>Broad support was received from DfE (Minerals and Petroleum Branch) and MPANI for the Council's comprehensive and robust evidence base, ongoing liaison with the local energy and mineral sectors and the Plan's recognition of the contribution these sectors make to the Borough's local economy.</p> <p>Evidence Paper 13 – Renewables (DPS 019)</p> <p>DfE welcomes the Plan's recognition that to underpin economic growth, the Borough needs a modern and sustainable economic infrastructure.</p>	<p>0009, 0030, 0034</p>

Supports the Council's approach to the decommissioning of redundant renewable infrastructure.	
Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document, rather they seek the inclusion of additional information in one of the accompanying evidence papers. The Council will consider the matters raised when it brings forward any update of its evidence papers.	

Environmental Resilience and Protection

Strategic Policy SP 10: Environmental Resilience and Protection	
Summary of Representations	Relevant Reps
<p>Support and objections were received for the nature and content of Strategic Policy 10 Environmental Resilience and Protection. Support was provided from a range of the Council's statutory partners, including DfE (Central Management Branch), DfL Rivers, BCC and NIHE as well as several community /environmental groups. Whilst not exhaustive, the range of support raised include:</p> <ul style="list-style-type: none"> • BCC: Welcomes policy approach and ongoing cross boundary working practices. Considers there to be no conflict. • DfE (Central Management Branch): Welcomes the Council's policy approach to waste management, and the move away from current landfill practices. • MUDC: Supports the Council's approach to planning and flooding. • NIHE: Welcomes the Council's approach to climate change and environmental challenges i.e. greenhouse gas emissions, waste production, land contamination and flooding. Supports the Council's integration of development and transport which reduces the need to travel, and the Council's 'fabric-first' approach to energy efficiency in new development. <p>Whilst Strategic Policy SP 10 received support, several detailed policy wording changes were also recommended by NIEA Natural Environment Division (NED), AADAA and the SMWT. These relate to risks from potential groundwater flooding, and the environmental protection of rivers and streams.</p> <p>An objection was received from a private individual who considers the Plan's response to waste management and disposal facilities does not address how litter and waste impacts upon the economy and environment. A further objection was received from DADRA which considers the policy does not fully address the potential for development to impact upon the health and safety of residents.</p> <p>The Woodland Trust provided comments regarding the importance of trees in relation to flood risk, air quality, climate change and public health.</p>	<p>0008, 0019, 0030, 0036, 0051, 0057, 0058, 0074, 0077, 0102, 0103, 0107, 0112.</p>
<p>Council Position: General support for Policy SP 10: Environmental Resilience and Protection is noted and welcomed, particularly from BCC, DfE (Central Management Branch), MUDC and NIHE as the Council's statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Environmental Resilience and Protection has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy SP 10 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

DM 46: The Control of Development in Flood Plains	
Summary of Representations	Relevant Reps
<p>Broad support and objections were received for the nature and content of Policy DM 46 The Control of Development in Flood Plains. Support was provided from a range of the Council's statutory partners. Whilst not exhaustive, the range of support raised include:</p> <ul style="list-style-type: none"> BCC and MUDC: Policy support indicated from both neighbouring Councils. DfI (Water and Drainage Policy Division): Welcomes the Council's policy approach and considers it is fully aligned with the SPPS. NIHE: Welcomes the Council's policy approach and adoption of the precautionary principle to planning and flood risk. Representations received from AADAA and SMWT, both indicated that flood plains should not only help alleviate flooding downstream but should also protect rivers and protect wildlife. <p>Whilst Policy DM 46 received support, several detailed policy wording changes were also requested by DfI (Water and Drainage Policy Division), and the AADAA and SMWT. These relate to a request for all development to provide sustainable forms of drainage and policy interpretation.</p>	0008, 0019, 0036, 0051, 0057, 0107.
<p>Council Position: Broad support for Policy DM 46: The Control of Development in Flood Plains is noted and welcomed particularly from BCC, DfI (Rivers), MUDC and NIHE as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to The Control of Development in Flood Plains has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 46 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

DM 47: Surface Water Drainage and Sustainable Drainage Systems	
Summary of Representations	Relevant Reps
<p>Broad support was received for the nature and content of Policy DM 47 Surface Water Drainage and Sustainable Drainage Systems from a range of the Council's statutory partners. Whilst not exhaustive, the range of support raised include:</p> <ul style="list-style-type: none"> BCC and MUDC: Policy support indicated from both neighbouring Councils. 	0008, 0019, 0036, 0051, 0057, 0062, 0107, 0109.

<ul style="list-style-type: none"> • DfI (Strategic Planning): Considers the Council's approach has taken account of the SPPS and Departmental Guidance on the preparation of LDP policies for Flood Risk Management. • NIHE: Welcomes the promotion of Sustainable Urban Drainage Systems and the need for drainage assessments to be provided for all new residential developments in area where there is evidence or potential for surface water flooding. • NIW: Welcomes that all proposals with SuDS must be accompanied by a management plan. <p>Whilst Policy DM 47 received support, several detailed policy wording changes were also recommended. These relate to:</p> <ul style="list-style-type: none"> • AADA, SMWT: Various 'soft' SuDS options are suggested for policy inclusion. • NIW: Various specific 'hard' SuDS options are suggested also. <p>No objections were received to Policy DM 47.</p>	
<p>Council Position: General support for Policy DM 47: Surface Water Drainage and Sustainable Drainage Systems is noted and welcomed particularly from BCC, DfI (Strategic Planning), MUDC, NIHE and NIW as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Surface Water Drainage and Sustainable Drainage Systems has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 47 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

DM 48: Reservoir Flood Risk	
Summary of Representations	Relevant Reps
<p>Broad support was received for the nature and content of Policy 48 Reservoir Flood Risk from a range of the Council's statutory partners. Whilst not exhaustive, the range of support raised include:</p> <ul style="list-style-type: none"> • NIHE: Welcome the Council's policy approach that ensures new development does not increase the risk of flooding. Support indicated for the Council's precautionary policy approach. • DfI (Rivers): Considers Policy DM 48 has taken account of the SPPS and the Department's guidance. <p>Whilst Policy DM 48 received support, several detailed policy wording changes were also recommended. These relate to:</p> <ul style="list-style-type: none"> • NIW: To include the Hyde Park Road, Newtownabbey reservoir in the Plan's list of Controlled Reservoirs. 	<p>0008, 0062, 0107, 0109.</p>

<ul style="list-style-type: none"> A private individual requested that the reference in policy to reservoir monitoring and improvement should be excluded. <p>One objection was received in relation to the interpretation of Policy DM 48.2 and the physical extent to which the policy applies.</p>	
<p>Council Position: Broad support for Policy DM 48: Reservoir Flood Risk is noted and welcomed particularly from DfI (Rivers) and NIHE as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and the approach to Reservoir Flood Risk has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 48 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

DM 49: Artificial Modification of Watercourses	
Summary of Representations	Relevant Reps
Broad support was received for the nature and content of Policy DM 49 Artificial Modification of Watercourses from two of the Council's statutory partners (BCC and NIHE) and a local charity. The BHP welcomed the Plan's approach to making space for water.	0008, 0051, 0060.
<p>Council Position: Broad support for Policy DM 49: Artificial Modification of Watercourses is noted and welcomed, particularly from BCC and NIHE as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and the approach to Artificial Modification of Watercourses has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 49 is sound.</p> <p>No representations objected to or sought modifications in relation to this Policy.</p>	

DM 50: Pollution	
Summary of Representations	Relevant Reps
Broad support was received for the nature and content of Policy DM 50 Pollution from two of the Council's statutory partners (BCC and NIHE). The Council received support for its approach to pollution, recognising the associated impacts and dangers.	0008, 0051, 0058, 0077, 0107.
Whilst Policy DM 50 received support, several detailed policy wording changes were also recommended.	

<ul style="list-style-type: none"> • DfI (Strategic Planning) considers the Plan should be consistent in its approach to amenity, and requests that the Council considers how the Plan responds to any area defined as a 'Local Air Quality Management Area'. • SMWT considers the Plan should be more proactive in protecting the Six Mile Valley from general pollution. • Two private respondents requested that the Council considers a dedicated Rivers Policy be included in the Plan, as well as a requirement for 'all' applications to be accompanied by an appropriate Water Quality Impact Assessment. <p>No objections were received to Policy DM 50.</p>	
<p>Council Position: Broad support for Policy DM 50: Pollution is noted and welcomed particularly from BCC and NIHE as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Pollution has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 50 is sound.</p> <p>Having considered those representations that sought modifications in relation to this Policy there is one where the Council is open to minor change for the purposes of clarification, should the Independent Examination consider it beneficial. This is set out in Section 7 of this Report. In relation to the other modifications sought the Council considers that no change is required.</p>	

DM 51: Major Hazards	
Summary of Representations	Relevant Reps
Broad support was received for the nature and content of Policy DM 51 Major Hazards from two of the Council's statutory partners (BCC and NIHE).	0008, 0051
<p>Council Position: Broad support for Policy DM 51 Major Hazards is noted and welcomed, particularly from BCC and NIHE as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and the approach to Major Hazards has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 51 is sound.</p> <p>No representations objected to or sought modifications in relation to this Policy.</p>	

DM 52: Contaminated Land	
Summary of Representations	Relevant Reps
Broad support was received for the nature and content of Policy DM 52 Contaminated Lands from two of the Council's statutory partners (BCC and NIHE). NIHE recognises that site investigations and risk assessments	0008, 0036, 0051, 0057, 0102

<p>with remediation measures where necessary, are important in ensuring there is no unacceptable risk to public health or the natural environment because of development.</p> <p>Support was also received from AADAA and SMWT who encouraged the Council to ensure investigation mechanisms used are professional and robust in nature.</p> <p>Whilst Policy DM 52 received support, NED raised an objection and considers the policy only refers to human health receptors. NED recommends that the Council includes environmental receptors which require a developer to, if required, submit a Remediation Strategy and associated Verification Report (in addition to a site investigation and risk assessment). NED also requests the Council to include a reference to groundwater contamination.</p>	
<p>Council Position: Broad support for Policy DM 52: Contaminated Lands is noted and welcomed particularly from BCC and NIHE as statutory consultees. The Council considers the policy as drafted is appropriate and reasonable and that the approach to Contaminated Land has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 52 is sound.</p> <p>Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.</p>	

DM 53: Waste Management and Disposal Facilities	
Summary of Representations	Relevant Reps
<p>Broad support was received for the nature and content of Policy DM 53 Waste Management and Disposal Facilities from two of the Council's statutory partners NIEA (NED) and DfI (Strategic Planning).</p> <p>Several detailed policy wording changes were also requested.</p> <ul style="list-style-type: none"> NED: To ensure the policy does not restrict existing outdoor waste processing operations. DfI (Strategic Planning): The Council should consider the decommissioning of waste plants as well as their restoration and aftercare. <p>An objection was received from NoARC21. The response considers the Plan fails to meet the World Health Organisation (WHO) guidelines on air quality. Clarification is requested regarding the Council's definition of 'adverse impact' and how the adverse effects of proposals are to be measured.</p>	0014, 0102, 0107
<p>Council Position: Broad support for Policy DM 53: Waste Management and Disposal Facilities is noted and welcomed particularly from NIEA (NED) and DfI (Strategic Planning) as statutory consultees. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to Waste Management and Disposal Facilities has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 53 is sound.</p>	

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

DM 54: Protection of Existing Waste Management Facilities

Summary of Representations

Support was received for the nature and content of Policy DM 54: Protection of Existing Waste Management Facilities from the Council's statutory partner, NIEA (NED).

Council Position: Broad support for Policy DM 54: Protection of Existing Waste Management Facilities is noted and welcomed, particularly from NIEA (NED) as a statutory consultee. The Council considers that the policy as drafted is appropriate and reasonable and that the approach to the protection of existing waste management facilities has taken account of the provisions of the RDS and SPPS. It is the opinion of the Council that Policy DM 54 is sound.

No representations objected to or sought modifications in relation to this Policy.

Relevant Reprs

0102

Evidence Paper 14 – Flooding

Summary of Representations

Support was received from the Council's statutory partner DfI (Strategic Planning and Water and Drainage Policy Division) for the nature and content of the Plan's supporting Evidence Paper 14 – Flooding (DPS 020). Several wording changes within the Evidence Paper were suggested in the interests of accuracy and clarity.

Council Position: The Council considers that there is sufficient evidence to support the policy approach within the DPS. The Council considers these comments have no impact on the Draft Plan Strategy document, rather they seek the inclusion of additional information in one of the accompanying evidence papers. The Council will consider the matters raised when it brings forward any update of its evidence papers.

Relevant Reprs

0107

Monitoring of Our Plan

Monitoring of Our Plan Indicative Monitoring Framework (IMF)	
Summary of Representations	Relevant Reps
<p>Both broad support and objections were received to the nature and content of the 'Monitoring of our Plan' section of the Plan and the Indicative Monitoring Framework (IMF). Support was received from several of the Council's statutory partners to include, DfI (Strategic Planning), NIHE, Ulster University, a charitable organisation, the RSPB NI, and private individuals.</p> <p>DfI (Strategic Planning) welcomed the IMF and reiterated that it should provide the basis to trigger any requirement to amend policy, proposals, and strategy of the DPS. NIHE welcomed the inclusion of the following indicators: (1) The number of homes delivered by tenure, and (2) Lifetime Homes.</p> <p>Whilst the monitoring indicators received broad support, several amendments were requested by some of the Council's statutory partners and private individuals. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • DfI (Strategic Planning): Considers the IMF does not clearly identify targets and triggers. • NIHE: Considers the IMF should include: (1) Housing approvals in the open countryside as an indicator (to ensure they do not exceed 40%), (2) The NIHE Housing Needs Assessment as an indicator, (3) Wheelchair accessible homes. • RSPB (NI): Considers the IMF is not 'SMART' (Specific, Measurable, Attainable, Realistic, and Timely) due to absence of triggers. • Translink: Suggests the Council should consider how the achievement of 'Sustainable Development' is properly measured. • UU and Private Individuals: Considers the IMF should uplift the number of new jobs created from 9,000 to 10,000, and the number of homes from 9,750 to 11,220. <p>Two objections were received. These relate to:</p> <ul style="list-style-type: none"> • Nutts Corner Enterprise Park: Considers the Plan lacks detail on how the proposed Nutts Corner SEL will be monitored. • DfI (Roads): Considers the Transportation Schemes identified in Policy SP 3.2 should not be included in the IMF as their delivery is not the sole responsibility of the Council. 	0008, 0013, 0033, 0035, 0039, 0040, 0041, 0075, 0103, 0107
<p>Council Position: General support for the 'Monitoring of our Plan' and the Plan's IMF is noted and welcomed. The Council considers the existing IMF as appropriate and reasonable, and consistent with the RDS and SPPS.</p> <p>The Council acknowledges that the Council cannot deliver all of outcomes of the IMF by itself and that a 'partnership approach' is required. Furthermore, para. 14.10 of the Plan indicates that as the IMF is</p>	

indicative, it will continue to develop over time as the LDP progresses. The draft IMF will be reviewed as the Council moves towards preparation of the LPP.

Having considered those representations that sought modifications in relation to this policy, the Council considers that no change is required.

3 Summary of Main Issues Raised to Plan Assessments

- 3.1 This section of the Report sets out a high-level summary of the main issues raised under each section of the DPS assessments and a summary of the Council's position on those matters raised. It should be read alongside the full set of representations that are available to view and submitted for IE. In addition, it should be read alongside the accompanying Representation by Issue Report and Representations by Respondent Report.
- 3.2 In summary, the Council considers that the matters raised do no impact on the DPS.

Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA)	
Summary of Representations	Relevant Reprs
<p>Broad support and objections were received in relation to the SA Report including from Government Departments (DfI, DAERA and HED) and private developers. Whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • Enhancement of text to including the consideration of the marine area and marine legislation/policy and SA Glossary. • Support for scoring of certain policies. • Suggestions and clarification on certain policies such as scoring and explanation for policies in the DPS including housing and WWTW capacity. • Housing - Reasonable alternatives should be reconsidered; sites have not been assessed; clarification needed as to why housing reduced in settlements. • Comments on policies in the DPS. 	0032, 0102, 0107, 0110, 0121.
<p>Council Position: The Council welcomes support received in relation to the SA Report.</p> <p>4 of the SA Report sets out the reasoning for the policy scorings. The rescoring of the policy as requested or textual changes does not impact on the policy as set out in the DPS.</p> <p>The Council considers that it has considered all reasonable alternatives. A final SA Statement will be published once the Plan is adopted which will show how consultation has been considered. In addition, the SA and LDP will be monitored. The SA Report also refers to marine area and relevant documentation. Comments in relation to the DPS are addressed.</p>	

Sustainability Appraisal Scoping Report	
Summary of Representations	Relevant Reprs
One representation was received in relation to the Scoping Report (HED). HED was very supportive of the SA Scoping Report and suggested enhancement of the text in relation to the historic environment.	0032.
Council Position: The Council welcomes support received in relation to the Scoping Report.	

Sustainability Appraisal Non-Technical Summary	
Summary of Representations	Relevant Reprs
No representations received.	n/a

Draft Habitats Regulations Assessment	
Summary of Representations	Relevant Reprs
<p>Only one respondent (DAERA (NIEA – NED)) commented on the draft Habitats Regulations Assessment (dHRA). DAERA were largely supportive of the dHRA and that the criteria used to screen in European sites for likely significant effects and Test of Likely Significance were sound. DAERA also considered that the potential impacts have been sufficiently covered and noted the recommendation/conclusions that the DPS would not adversely affect the integrity of the sites listed.</p> <p>DAERA raised a small number of comments. These included commentaries to be removed/clarified in the dHRA, policy wording, WWTW and outcomes/ recommendations of the dHRA.</p>	0102.
<p>Council Position: The Council welcomes the support from DAERA in relation to the dHRA. Amendments and points of clarification will be undertaken in the final version of the HRA - the issues raised do not impact on the soundness of the Plan.</p> <p>In relation to housing, the Council and Shared Environmental Service (SES) are content that WWTW have been considered and that it is important to note, as stated in the DPS, that housing sites will not be identified until the LPP stage of the Plan. This stage will also be subject to HRA. The Council has and will continue to engage with NIW as the plan progresses.</p>	

Equality (Section 75) Screening & Rural Needs Impact Assessment (ES & RNIA)	
Summary of Representations	Relevant Reps
Only one respondent (Autism NI) commented on the ES and RNIA and this was in relation to Section 75 only. This contained comments in relation to the legal duty to address the Autism Act (NI) 2011. This included the requirement for all public bodies to take account of the social and communication barriers faced by individuals with autism in accessing public services and public facilities.	0046.
Council Position: The Council welcomes the response from Autism NI. Whilst the response raised no specific issues in relation to the DPS, the LDP contains policy in relation to good design and accessibility for those with disabilities.	

4 Summary of Counter-Representations

- 4.1 This section sets out a summary of the responses received do the DPS during the counter representation public consultation phase. The Council was required to make all 122 representations to the draft Plan Strategy available for public inspection and consultation. This was known as the counter representation stage. The Council received 26 responses at the counter representation stage which ran for from 11 October 2019 to 6 December 2019.
- 4.2 The Council has published all counter representations to the DPS in full. This section should also be read alongside the accompanying Counter Representation Report ([DPS-S-004](#)).
- 4.3 Under Section 18 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015 any person may make representations about a site-specific policy representation. A counter representation must not propose any further changes to the development plan document.
- 4.4 Under Section 2 of the Regulations a 'site-specific policy representation' means any representation which seeks to change a development plan document by adding a site-specific policy to the development plan document; or altering or deleting any site-specific policy in the development plan document.
- 4.5 It is the opinion of the Council that the majority of responses received are not counter representations to be heard at the Plan Strategy stage of Independent Examination for the reasons set out below.
- 4.6 A full list of respondents is set out in [Annex A](#) of this report for information. A list of abbreviations is set out in [Annex B](#) of this Report.

Representations made during the Counter Representation Period	
Summary of Representations	Relevant Reprs
<p>There were 26 representations submitted during the counter representation period from a range of respondents, including residents' groups, private individuals, and government departments and planning consultants. In particular, whilst not exhaustive, the issues raised include:</p> <ul style="list-style-type: none"> • DCA expressed support for the housing growth allocation to Dunadry and disagreed with those respondents to the DPS seeking an increase in the allocation figure. • A private individual expressed concern that BIA is seeking to operate a monopoly at the airport which is deemed not in the public interest. • HED disagrees with proposed detailed policy wording changes in relation to Historic Parks, Gardens and Demesnes. • HED disagrees with the arguments put forward for various site-specific representations in relation to their approach assessment of the historic environment, while suggesting that this consideration is appropriate at the Local Policies Plan stage of the process. • A number of issues were raised in relation to renewable energy, which were not related to a previous representation. • A planning consultant made a number of comments in relation representations regarding the housing growth figure, delivery 	CR 123 to CR 148 (Inclusive)

<p>and thresholds related to Affordable Housing and Lifetime Homes.</p> <ul style="list-style-type: none"> • A planning consultant disagreed with a representation which objected to the designation of the Abbey Centre as a large town centre and what was considered the lack of evidence to support its designation. • A planning consultant made a number of comments regarding the extent of land proposed by a representation at Mallusk. • A range of issues were raised by a planning consultant in relation to representations commenting on BIA SEL. These included considering that arguments from a number of respondents are incorrect and misplaced in relation to car parking; BIA operations; that 3rd part operators are disadvantaged; that BIA SEL should be extended to include additional lands; and the range of uses appropriate within BIA SEL. • A planning consultant made comments in support of representations in relation to the Crumlin and Nutts Corner areas. • A number of planning consultants raised issues in relation to Nutts Corner SEL including, disagreeing with a representation which sought to amend the policy approach regarding the proposed Nutts Corner SEL; disagreeing with the boundary of Nutts Corner SEL as proposed by a number of representations; and disagreeing there is ample employment land available at Nutts Corner. 	
<p>Council Position: The Council has reviewed all 26 representations received during the counter representation period and has given a preliminary view on which responses it considers are counter representations as defined under The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.</p> <p>Having reviewed the responses, the Council considers that the representations submitted fall under 3 main categories, which are identified below:</p> <p>Category A: Responses submitted during the counter representation stage which make comment on site-specific policy representations received during the formal representation period.</p> <p>The Council considers that these original representations on site-specific matters received during the formal representation period, were premature in their submission to the DPS stage, as they consider issues more appropriate for debate at the Local Policies Plan Stage of the LDP process. These are primarily comprised of representations which advocate and promote the attributes of sites or areas of land for inclusion within, or as, various designations and zonings.</p> <p>On this basis, the Council considers that the status of such representations submitted as counter representations may not be appropriate for debate at IE at DPS stage of the process.</p> <p>Category B: Responses submitted during the counter representation stage which make comment primarily on representations received during the formal representation period which raised issues on policy matters relating to site-specific designations. For example, these may include representations made regarding the approach to development within town centres or Historic Park, Garden and Demesne designations.</p>	

On this basis, the Council considers such representations may not meet the requirements of The Local Development Plan (Northern Ireland) Regulations 2015 as they make comment on policy matters rather than site-specific matters and as such may not be appropriate for debate at IE at DPS stage of the process.

Category C: Responses submitted during the counter representation stage, but which clearly do not meet legislative requirements and therefore are not considered counter representations. Essentially representations raising new issues or providing new comments on the DPS, rather relating to a site-specific policy representation or policy matter.

On this basis, the Council considers such representations may not meet the requirements of The Local Development Plan (Northern Ireland) Regulations 2015 as they raise new issues.

Conclusion: It is the view of the Council that none of the 26 representations are Counter Representations to be heard at the DPS stage for the reasons set out above.

5 Miscellaneous Plan Issues

- 5.1 This section of the Report sets out a summary of those miscellaneous matters which do not relate easily to a particular section of the DPS, raised during the public consultation period and gives a summary of the Council's position on the matters raised. All representations have been made publicly available and further detail is available in the accompanying Representation by Issue Report and Representations by Respondent Report.
- 5.2 A full list of respondents is set out in [Annex A](#) of this report for information. The Council has published a range of documents as set out on pages 7 and 8 of this Report which should be read alongside this section for further detail on the responses received and how the Council considered them.

Miscellaneous Matters	
Summary of Representations	Relevant Reps
<p>Comments which do not relate easily to a particular section of the Plan or a corresponding policy, were received from a range of respondents, including government departments, private individuals, industry groups and adjoining councils. Whilst not exhaustive, the issues raised include:</p> <p>Overall soundness of the Plan A range of respondents including DE, NIW, MPA (NI), DfI (TPMU), private individuals and planning consultants consider the whole plan to be generally sound. Translink considers the Plan has been cognisant of transport studies for the Borough, promotes sustainable transport and welcomes continued engagement. DfI (Roads) consider the whole plan to be unsound, subject to their issues being adequately addressed.</p> <p>NIEA 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.</p> <p>Cross Boundary Engagement A number of neighbouring Council's (MEABC and BCC) consider that in general there is no conflict between the DPS and their emerging Plans, while LCCC welcomes the level of cross boundary engagement. MUDC advised that they saw no conflict in between respective plans subject to a few points of clarification. DfI considers the Council should be able to demonstrate that policy in respect of cross boundary designations does not conflict with the DPDs of neighbouring councils.</p> <p>Timetable A number of respondents raised that the period of the Plan needed to be expanded and that the timetable was out of date.</p> <p>Engagement NIHE raised engagement and the need to identify alternative strategies or options in relation to housing.</p>	<p>0003, 0006, 0008, 0012, 0013, 0019, 0020, 0034, 0036, 0044, 0045, 0051, 0054, 0057, 0062, 0067, 0068, 0069, 0074, 0079, 0084, 0092, 0093, 0096, 0102, 0107, 0110.</p>

Legacy Plans and Policy

A number of respondents raised issues with planning decisions made through the development management process and use of legacy plans.

DADRA considers regional legacy policy is flawed, particularly the SPPS and PPS 18 and notes concerns regarding legacy planning decisions. Considers 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). Raises concerns about future planning decisions.

Plan Structure

A planning consultant 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.

DfI (Strategic Planning) welcome the structure of the document with regards to Strategic Policies, Detailed Management Policies, the clear link to Strategic Objectives and the Community Plan. Also note the approach to bring forward designations and zonings at Local Policies Plan stage.

Council Position: Recognition of the soundness of the Council's DPS is noted and welcomed. Confirmation from neighbouring councils regarding no conflict between respective plans is also welcomed.

The Council is content its Plan is sound and has produced a Soundness Report to demonstrate how it considers the Plan to be sound, including its Timetable.

The application of legacy policy is not considered to be relevant to the current stage of the LDP.

6 Typographical Errors

6.1 This section of the Report sets out a list of typographical errors within the published draft Plan Strategy.

Section	Sub Section	Page	Error
How to use this document	The Detailed Management Policies	11	DM (a) should include the line "here we outline our reasoned justification and rationale for the policy"
Policy Easy Guide			None
	Para 1.26	22	6 th line, should read 'Environmental' rather than Environment.
	Para 1.26	22	7 th line, should read 'Assessment' rather than Assessments.
	Para 1.27	23	2 nd line, replace 2 nd under with 'of'. 8 th line, replace 'RAMSAR' with 'Ramsar'.
Setting the Context		37	Points under Outcome 4, semi colons missing.
	Para. 2.38	41	6 th line, should read Department 'of' Health.
	Para. 2.64	47	1 st line, remove comma between strategy and 2018 - '... strategy 2018, shows ...'
Plan Vision and Strategic Objectives	Para. 3.15	57	Last line, rogue Heading 'Sustainable Development' – delete
SP 1: Sustainable Development			
None			
SP 2: Employment			
Table 4	79		'Metropolitan Newtownabbey' is a heading and should be bold text.
Para 5.10	82		5 th line, should read 'ensure that an'
DM 1.4	89		1 st line, 'uses' rather than 'use'.
DM 1.5	89		2 nd line, 'demonstrated that this will'
DM 2.7	92		2 nd line should read 'demonstrated that'
Para. 5.32	92		4 th line, delete 'policy'
Para 5.34	93		5 th line delete 'policy'
Para. 5.37	95		3 rd line delete 'policy'
DM 7.2	100		2 nd line, delete 'other'
DM 9.3	104		3 rd line before 'accord' add in "'where these'
SP 3: Transportation & Infrastructure			
Para. 3.10	112		4 th line replace "DM 10" with "DM 11"
Para. 6.11	114		5 th line, 'Transport Assessment Guidelines Proposals in Northern Ireland' should read 'Transport Assessment: Guidelines for Development Proposals in Northern Ireland'.
SP 4: Homes			
SP 4.3	134		2 nd line, delete 'below'.
Table 6	135		Delete '/' between Metropolitan Newtownabbey.
SP 4.9	136		4 th line, replace 'SP 06' with 'SP 6'
Para 7.17	138		5 th line replace '5,000 units' with '5,000 population'.
Para. 7.22	139		2 nd line, should read 'detailed management policy'
Para. 7.23	139		1 st line, should read 'detailed management policy'
DM 17.6 (d)	144		1 st line, should refer to an equipped children's play area.

DM 18C:	152	Title error: should read "Dwellings within a built up frontage" (not 'with')
SP 5 Community Infrastructure		
None		
SP 6 Placemaking and Good Design		
SP 6.3(a)	185	1 st /2 nd line should read 'detailed management policies'
DM 25.1 (e)	187	1 st line replace comma after "for all" with semicolon
SP 7: Historic Environment		
SP 7.2 (c)	204	3 rd line typo: 'Development and Archaeology'
SP 8 Natural Heritage		
Para 11.2	234	4 th line, should read Ramsar not RAMSAR.
Fig. 12	240	Map text & legend should read Ramsar not RAMSAR.
Para. 11.11	241	2 nd line, should read Ramsar not RAMSAR.
DM 37.1	241	4 th line, should read Ramsar not RAMSAR.
Para 11.13	243	1 st line, should read Ramsar not RAMSAR.
DM 40.2 (b)	251	2 nd line, should be 'or' instead of 'and'.
DM 40.5 (c)	251	Should be 'or' instead of 'and'.
DM 40.6 (d)	252	Should be 'or' instead of 'and'.
Para. 11.41	253	Should read Ramsar not RAMSAR.
SP 9 Natural Resources		
DM 42.4	256	1 st /2 nd line should read 'BS 5837:2012 (Trees in relation to design, demolition and construction - Recommendations).'
Para. 12.10	264	1 st line, should read 'resources' not 'sources'.
Para. 12.28	275	4 th line, remove comma after the word return.
Para. 12.29	275	1 st /2 nd line, reference to 'National Grid', should read 'Electricity Network'
SP 10: Environmental Resilience & Protection		
Side bar for section	278 - 307	'Environmental Resistance & Protection' - change to 'Environmental Resilience & Protection'.
Chapter 14: Monitoring of Our Plan		
Para 14.2	310	2 nd line, add comma after 'regionally and locally'
SP1	313	2 nd column, 3 rd line, should read Detailed Management Policies
SP 10	318	1 st column (Heading), should read Environmental 'Resilience' not Resilience.

7 Schedule of Suggested Minor Changes

- 7.1 A number of representations made in response to the public consultation on the Draft Plan Strategy (DPS) requested that changes be made to the Plan document. For the majority of these requests the Council considers that no change is required as the approach taken in the DPS is considered to be appropriate and reasonable, as set out in the preceding chapters of this Report.
- 7.2 There were, however, also a number of requests for changes to be made to the plan document which the Council considers to be relatively minor in nature. These include requests for additional factual information or to update text to reflect legislative requirements, whilst others seek greater clarity in the wording of parts of the document. As a consequence, and to assist the Independent Examination process, this section of the Report sets out a schedule of suggested minor changes where the Council is open to change to the DPS document should the appointed Independent Examiner(s) consider it beneficial.
- 7.3 In bringing forward this schedule of minor changes the Council has taken into account the Department for Infrastructure's Development Plan Practice Note 10 (DPPN) 'Submitting Development Plan Documents for Independent Examination', and considers that none of the changes suggested represent a focused change as defined in the DPPN. Furthermore, the Council is content that the minor changes suggested, both individually and cumulatively, do not have any impact on the soundness of the DPS nor any of the accompanying assessments including the Sustainability Appraisal incorporating Strategic Environmental Assessment, the draft Habitats Regulation Assessment and the Equality (Section 75) Screening and Rural Needs Impact Assessment Report.
- 7.4 The list of suggested minor changes which the Council considers to be reasonable/beneficial and where it would be open to change are set out below in the running order of the DPS document (with suggested amendments generally highlighted in bold text). Each suggested minor change and its rationale is set out in the 'Representations by Issue Report' and 'Representations by Respondent Report'.

No.	Plan Section	Representation	Page/Para.	Suggested Minor Change (amended text show in bold)
Section : Introduction				
	Introduction	None	None	The Council suggests no minor changes to this section.
Section 2: Setting the Context				
1.	Introduction Text	LA03/DPS/0008	Page 26: Paragraph 2.5	"...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..."

2.	Regional Policy Context	LA03/DPS/0102	Page 30/31: insertion of new paragraphs after Paragraph 2.20.	<p>“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</p> <p>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</p>

				<p>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."</p> <p>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>
Section 3: Strategic Objectives				
3.	Strategic Objective 1	LA03/DPS/0102	Page 58	"...in our settlements, countryside and coast... "
4.	Strategic Objective 3	LA03/DPS/0063	Page 58	"employment locations including the Regional Gateway at Belfast International Airport "
5.	Strategic Objective 11	LA03/DPS/0036 LA03/DPS/0057	Page 59	Insertion of comma after biodiversity to read "biodiversity, and conserve".
Section 4: Sustainable Development				
6.	SP 1.3: Sustainable Development	LA03/DPS/0102	Page 62 after SP 1.2 Insertion of new paragraph	<p>"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, remaining paragraphs will be renumbered.</p>

7.	SP 1.4: Development Impact Assessments	LA03/DPS/0102	Page 63: suggested additional text in SP 1.4	"...to allow proper consideration of the impacts of the development (to include where relevant impacts on the marine area) and any mitigation measures proposed."
8.	SP 1.6: Spatial Growth Strategy	LA03/DPS/0102	Page 65: suggested additional text SP 1.6 (g)	(g) "...afford suitable protection to our Borough's natural and historic environment, including the adjacent marine environment , in accommodating growth..."
9.	SP 1: Why we have taken this approach	LA03/DPS/0102	Page 68: suggested additional text in Paragraph 4.2	"...the careful management of our historic environment and natural heritage, including the adjacent marine area. "
Section 5: Employment				
10.	SP 2.12: Town Centres & Retailing	LA03/DPS/0107	Page 79: SP 2 – Table 4	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 (DPS 010). The suggested revised table is set out below.
11.	DM 1.4: Local Employment Sites	LA03/DPS/0107	Page 89 suggested additional text in DM 1.4 (c)	(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".
12.	DM 6: Development within Centres	LA03/DPS/0107 LA03/DPS/0108	Page 98 suggested additional text in DM 6.1 Footnote	Policy DM 6.1: "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."
13.	DM 6: Development within Centres	LA03/DPS/0042 LA03/DPS/0055 LA03/DPS/0107	Page 98: Replacement of DM 6.1 a-c	DM 6.1 (a) – (c): "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. "
14.	DM 6: Development within Centres	LA03/DPS/0107	Page 98: Additional paragraph after DM 6.4	"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."
15.	DM 7.1 & DM 7.2: Sequential Test	LA03/DPS/0118	Page 100: Deletion of words in DM 7.1 and DM 7.2	Deletion of the words "that generate significant footfall such as commercial leisure uses" in DM 7.1. Deletion of the words "that generate significant footfall" in DM 7.2.
16.	DM 7.2: Sequential Test	LA03/DPS/0107	Page 100: DM 7.2 (a)	Amend 'commercial centre' to 'identified

				centre'.
17.	DM 7.5: Retail Assessment	LA03/DPS/0107	Page 101: suggested additional text in DM 7.5	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. "
18.	DM 9.4: Tourist Accommodation	LA03/DPS/0107	Page 104: suggested additional text in DM 9.4	Policy 9.4 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..."
19.	DM 9.10: Tourist Accommodation (General Criteria)	LA03/DPS/0103	Page 105: Additional criteria DM 9.10 (f)	"(f) existing or planned public access to tourism assets, including landscape features and the coast, are safeguarded or enhanced."
Section 6: Transportation				
20.	SP 3.9: Transport Assessments & Travel Plans	LA03/DPS/0107	Page 112: Suggested additional text SP 3.9	"..... more sustainable travel patterns and to reduce the level of private car use ".
21.	SP 3: Why we have taken this approach	LA03/DPS/0107	Page 115: Paragraph 6.15 suggested revised text	"by a Local Transport Study... "
22.	DM 10.1 (a): Access & Parking	LA03/DPS/0107	Page 118: suggested revised text DM 10.1(a)	Deletion of the word "local" in relation to the road network.
23.	DM 10.1 (b) Access & Parking	LA03/DPS/0107	Page 118: suggested additional text DM 10.1(b)	"Access arrangements do not prejudice road safety or significantly inconvenience the flow of people or goods ".

24.	DM 10: Amplification	LA03/DPS/0107	Page 119: Paragraph 6.21	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. "
25.	DM 12.1(b): Active Travel	LA03/DPS/0107	Page 121: suggested additional text DM 12.1(b)	"...and attractive walking and cycling linkages to...."
26.	DM 14.1(c) Public Utilities and Infrastructure	LA03/DPS/0103	Page 126: suggested revised text DM 14.1(c)	"The Proposal will not have an unacceptable adverse impact on local amenity or the environment".
27.	DM 14.3(a): Public Utilities (Overhead Electricity Lines)	LA03/DPS/0106	Page 126: suggested additional text DM 14.3(a)	".....landscape importance as set out in SP 8 ".
28.	DM 14.4: Public Utilities (Development within the vicinity of a wastewater treatment works)	LA03/DPS/0062 LA03/DPS/0107	Page 127: suggested additional text DM 14.4. Insertion of new paragraph and text Insertion of footnote	"Proposals involving development within the vicinity of a wastewater treatment works will only be permitted...." " 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 ". 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) ".
29.	DM 16.4: Telecom Facilities & Digital Services	LA03/DPS/0107	Page 128: suggested additional text DM 16.4	After Code Systems Operators insert a footnote to read " As defined under The Communications Act 2003 ".

Section 7: Homes				
30.	DM 17.1 (d): Homes in Settlements	LA03/DPS/0008	Page 143: suggested additional text DM 17.1 (d)	"...approach which helps facilitate wheelchair accessibility...."
Section 8: Community Infrastructure				
31.	Amplification section of Policy DM 23: Protection of Open Space	LA03/DPS/0108	Page 175: suggested additional text Paragraph 8.18	"Examples of significant...may include the provision of affordable housing where a demonstrable local need....."
Section 9: Placemaking and Good Design				
32.	SP 6.1: Placemaking and Good Design	LA03/DPS/0094	Page 184: suggested additional text SP 6.1	".....architects, landscape architects , urban designers...."
33.	SP 6.2: Placemaking and Good Design	LA03/DPS/0103	Page 184: suggested additional text SP 6.2	".....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. "
34.	Why we have this Policy section of DM 27.	LA03/DPS/0103	Page 192: suggested additional text Paragraph 9.20	".....integrate into their surroundings, assist the promotion of biodiversity and to protect the amenity....."
35.	DM 27.5: Rural Design & Character (Design)	LA03/DPS/0103	Page 194: suggested additional text DM 27.5	"All proposals for development in the countryside will be expected to address biodiversity impact and be accompanied...."
Section 10: Historic Environment				
	Section 10: Historic Environment	None	None	The Council suggests no minor changes to this section.
Section 11: Natural Heritage				
36.	SP 8.2: Natural Heritage	LA03/DPS/0103	Page 236: suggested additional text SP 8.2 (b)	"....adverse impact of development, including consideration of potential cumulative effects. "

37.	SP 8.4: Landscape & Coast	LA03/DPS/0102	Page 237: suggested additional text SP 8.4	"...the overall landscape character, seascape character and specific..."
38.	DM 38: Protected Species Amplification section	LA03/DPS/0102	Page 246: suggested additional text Paragraph 11.27	"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..."
39.	DM 39.2: Habitats, Species & Features of Natural Heritage Importance	LA03/DPS/0102	Page 247: suggested additional text DM 39.2	"Where there is potential or evidence to suggest , that a habitat....."
40.	DM 40: Landscape Protection	LA03/DPS/0102	Page 250: suggested additional text Paragraph 11.35	"....as well as being important economic, recreational and cultural assets.".
41.	Policy DM 40.2: Landscape Protection	LA03/DPS/0102	Page 251: suggested additional text DM 40.2	".....assessment of landscape impacts a Landscape and Visual Impact Assessment proportionate to the development"
42.	Policy DM 41.1 (b): Coastal Protection	LA03/DPS/0102	Page 253: suggested additional text DM 41.1 (b)	".....the qualities of the coastal landscape (including seascape character) while still protecting...".
43.	Amplification section of DM 41: Coastal Protection	LA03/DPS/0102	Page 255: Suggested additional text Paragraph 11.43	"...Coastal Policy Area should consider their impact on seascape character and how they can enhance the area.....".
44.	Amplification section of DM 41: Coastal Protection	LA03/DPS/0102	Page 255 Suggested additional text Paragraph 11.44	"...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 ..."
45.	Policy DM 42.1: Trees & Development	LA03/DPS/0008	Page 256 Suggested additional text DM 42.1 (a)	"(a) Promote additional tree planting...native species planting and that seek to incorporate tree-lined streets within new developments. "
Section 12: Natural Resources				
46.	SP 9.1: Natural Resources	LA03/DPS/0009	Page 262 Suggested additional text SP 9.1	"Development will be supported ... will not have an unacceptable adverse impact on the environment, amenity or public safety..."
47.	SP 9 Amplification section.	LA03/DPS/0009 (this relates to issues raised under SP 1: Sustainable Development and SP4: Homes as well as SP 9: Natural Resources)	Page 264 Insert after amplification section	<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</p>

				construction materials and recycled materials wherever feasible."
48.	Amplification section of Policy DM 45: Renewable Energy Development	LA03/DPS/0103	Page 275 Suggested additional text Paragraph 12.28	Deletion of the word "repowering" from paragraph 12.28 Insert new sentence at end of 12.28 re: repowering "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".
Section 13: Natural Resources				
49.	Amplification section of DM 46: The Control of Development in Flood Plains	LA03/DPS/0107	Page 288 additional text Paragraph 13.21	" 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."
50.	Policy DM 47: Surface Water Drainage and SuDs	LA03/DPS/0062	Page 291 suggested additional text DM 47.5	DM 47.5 "...use of the following measures to assist in minimising flood risk: 'soft' 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."
51.	Amplification section of DM 47: Surface Water Drainage and SuDs	LA03/DPS/0062	Page 292 Suggested additional text	" Green roofs, permeable surfaces, oversized storm pipes, water storage..."

			Paragraph 13.30	
52.	Amplification section of DM 48: Reservoir Flood Risk	LA03/DPS/0062	<p>Page 295 suggested deletion Paragraph 13.35</p> <p>Page 296 Suggested revised text Paragraph 13.36</p>	<p>Delete paragraph 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>
53.	Policy DM 50: Pollution	LA03/DPS/0107	Page 298 Suggested revised text DM 50.1	"...the development will not have an unacceptable adverse impact on local amenity or the environment..."
Section 14 Monitoring of Our Plan				
	Section 14 Monitoring of Our Plan	None	None	The Council suggests no minor changes to this section.

Revised Table for Antrim and Newtownabbey Retail Hierarchy. (See suggested [Minor Change 10](#))

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	Urban <u>Metropolitan Newtownabbey</u>

		to a surrounding community.	<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> Greystone and Parkhall</p> <p>Rural Ballynure, Doagh, Parkgate, Templepatrick, and Toome</p>
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Annex A: List of Respondents

Draft Plan Strategy Representations

Reference Number	Respondent	On behalf of
LA03/DPS/0001	Andrew Crothers	
LA03/DPS/0002	David Reade	
LA03/DPS/0003	Department of Education	
LA03/DPS/0004	Lindsay Martin	
LA03/DPS/0005	Richard Martin	
LA03/DPS/0006	Henry Boyd	
LA03/DPS/0007	Co-Ownership Housing Association	
LA03/DPS/0008	Northern Ireland Housing Executive	
LA03/DPS/0009	Minerals & Petroleum Branch (Department for Economy)	
LA03/DPS/0010	Armagh City, Banbridge & Craigavon Borough Council	
LA03/DPS/0011	Construction Industry Training Board NI	
LA03/DPS/0012	Lightsource BP	
LA03/DPS/0013	Translink	
LA03/DPS/0014	No-ARC 21	
LA03/DPS/0015	Dunadry Community Association	
LA03/DPS/0016	Peter Morrow	
LA03/DPS/0017	John Mullholland	
LA03/DPS/0018	Kickhams GAC Creggan	
LA03/DPS/0019	Mid Ulster District Council	
LA03/DPS/0020	Mid & East Antrim Borough Council	
LA03/DPS/0021	John Doherty	
LA03/DPS/0022	Amanda Johnston	
LA03/DPS/0023	One2One Planning ¹	Antrim Agri Fertilisers Limited
LA03/DPS/0024	Gareth Kelly	
LA03/DPS/0025	One2One Planning ²	Mae Murray Foundation
LA03/DPS/0026	Donaldson Planning	Mc Causland Airport Garages Ltd
LA03/DPS/0027	Donaldson Planning	Kevin Logan
LA03/DPS/0028	Donaldson Planning	Peter Cooke
LA03/DPS/0029	Department of Justice	
LA03/DPS/0030	Department for the Economy	
LA03/DPS/0031	Jonathan Mc Grandle	John Greer
LA03/DPS/0032	Historic Environment Division (Department for Communities)	
LA03/DPS/0033	Gravis Planning	Brian Mc Bride
LA03/DPS/0034	Mineral Products Association (NI) Ltd	
LA03/DPS/0035	Gravis Planning	Ulster University
LA03/DPS/0036	Antrim and District Angling Association	

¹ No longer acting as agent (as of 02-03-2021)

² No longer acting as agent (as of 02-03-2021)

LA03/DPS/0037	Virgin Media	
LA03/DPS/0038	O'Toole & Starkey	David Wilson
LA03/DPS/0039	Gravis Planning	Corbo Properties
LA03/DPS/0040	Gravis Planning	Joyce & Hazel Bill
LA03/DPS/0041	Gravis Planning	Eastwood Estate Agents
LA03/DPS/0042	Inaltus Limited	
LA03/DPS/0043	Inaltus Limited	Tamar Selby
LA03/DPS/0044	Inaltus Limited	Bill Porter
LA03/DPS/0045	Inaltus Limited	Iain Mc Cabe
LA03/DPS/0046	Autism NI	
LA03/DPS/0047	O'Callaghan Planning	
LA03/DPS/0048	O'Callaghan Planning	
LA03/DPS/0049	O'Callaghan Planning	
LA03/DPS/0050	O'Callaghan Planning	Lindsay Martin
LA03/DPS/0051	Belfast City Council	
LA03/DPS/0052	Conway Group	
LA03/DPS/0053	Turley Planning	Heron Bros
LA03/DPS/0054	Turley Planning	Clanmill Housing Group
LA03/DPS/0055	One2One Planning ³	NewRiver REIT Uk Ltd
LA03/DPS/0056	The Transport Training Board	
LA03/DPS/0057	Six Mile Water Trust	
LA03/DPS/0058	Maurice and Joy Patterson	
LA03/DPS/0059	TSA Planning	Aberdeen Asset Management
LA03/DPS/0060	Belfast Hills Partnership	
LA03/DPS/0061	Quarryplan Ltd	Northstone
LA03/DPS/0062	NI Water	
LA03/DPS/0063	TSA Planning	Belfast International Airport (BIA)
LA03/DPS/0064	Inaltus Limited	
LA03/DPS/0065	MBA Planning	Carnhill NI Ltd
LA03/DPS/0066	Turley	Northern Ireland Federation of Housing Associations (NIFHA)
LA03/DPS/0067	TSA Planning	Lotus Homes (UK) Ltd
LA03/DPS/0068	TSA Planning	Lotus Homes (UK) Ltd
LA03/DPS/0069	TSA Planning	Lotus Homes (UK) Ltd
LA03/DPS/0070	Bombardier Aerospace	
LA03/DPS/0071	TSA Planning	Vaughan Homes
LA03/DPS/0072	TC Town Planning	Mr P Madden
LA03/DPS/0073	TSA Planning	EPISO 4 Antrim S.à.r.l.
LA03/DPS/0074	Drumadarragh and District Residents Association	*Note for LA03/DPS/0074* ⁴
LA03/DPS/0075	One2One Planning ⁵	Nutts Corner Enterprise Park
LA03/DPS/0076	Sinn Féin	
LA03/DPS/0077	Jim Gregg	
LA03/DPS/0078	Turley	Racarbry Developments Ltd
LA03/DPS/0079	TSA Planning	Vaughan Homes
LA03/DPS/0080	TSA Planning	Errigal Contracts
LA03/DPS/0081	James Hamill	
LA03/DPS/0082	Farningham Planning Ltd	Flaxall Holdings Ltd

³ No longer acting as agent (as of 02-03-2021)

⁴ Note for LA03/DPS/0074 Drumadarragh & District Residents Association

DVD Disc – 24 videos have been provided on a DVD disc as part of this representation. To view them please refer to Section 2B of the Council's DfI Submission Section.

⁵ No longer acting as agent (as of 02-03-2021)

LA03/DPS/0083	Farningham Planning Ltd	Flaxall Holdings Ltd
LA03/DPS/0084	TSA Planning	Davelle Developments Ltd
LA03/DPS/0085	Clyde Shanks	Moy Park
LA03/DPS/0086	Driver & Vehicle Agency	
LA03/DPS/0087	Clyde Shanks	Bulrush
LA03/DPS/0088	Clyde Shanks	Neptune Group
LA03/DPS/0089	Clyde Shanks	Ivan Jackson
LA03/DPS/0090	Clyde Shanks	JFM Construction Ltd
LA03/DPS/0091	Clyde Shanks	Mr Wilson Jackson
LA03/DPS/0092	Turley	Toland House Properties Limited
LA03/DPS/0093	Turley	Toland House Properties Limited
LA03/DPS/0094	David Dalzell	
LA03/DPS/0095	TSA Planning	Mr Michael Erwin
LA03/DPS/0096	Lisburn & Castlereagh City Council	
LA03/DPS/0097	WYG Planning & Environment	Private Client
LA03/DPS/0098	WYG Planning & Environment	Department of Education
LA03/DPS/0099	WYG Planning & Environment	Mr Paul Frazer
LA03/DPS/0100	WYG Planning & Environment	Mr Nigel Herdman
LA03/DPS/0101	RPS Group	Hyde Family
LA03/DPS/0102	Natural Environment Division, NIEA (Department of Agriculture, Environment and Rural Affairs)	
LA03/DPS/0103	RSPB NI	
LA03/DPS/0104	Jobling Planning & Environment	Mr Gawn Graham
LA03/DPS/0105	Conway Group	
LA03/DPS/0106	RPS Group	Northern Ireland Electricity Networks
LA03/DPS/0107	DFI Planning; Roads; Public Transport Division; Safe & Sustainable Travel Division; Rivers; and Water and Drainage Policy Division (Department for Infrastructure)	
LA03/DPS/0108	Invest NI	
LA03/DPS/0109	Jobling Planning & Environment	Mr Gary Bates
LA03/DPS/0110	Turley	South Bank Square Limited
LA03/DPS/0111	TC Town Planning	
LA03/DPS/0112	Woodland Trust	
LA03/DPS/0113	ABO Wind NI Ltd	
LA03/DPS/0114	Robert Logan Architects	Paul Rea
LA03/DPS/0115	Karl Property Investments	
LA03/DPS/0116	D R Mitchell Limited	
LA03/DPS/0117	Karl Property Investments Ltd	
LA03/DPS/0118	PUDSI	
LA03/DPS/0119	Donaldson Planning	John Mulholland Motors
LA03/DPS/0120	WPB	CHL
LA03/DPS/0121	MKA Planning	Denis McHenry
LA03/DPS/0122	David W Wilson	Mr Jackson

Supporting Assessments

Reference	Respondent	On behalf of	Assessment
LA03/DPS/0032	Historic Environment Division (Department for Communities)		SA/SEA
LA03/DPS/0046	Autism NI		EQIA
LA03/DPS/0102	Northern Ireland Environment Division (Department of Agriculture, Environment and Rural Affairs)		SA/Draft HRA

Submissions at Counter Representation Stage

Counter Representation Reference	Name of person making a Counter Representation	On Behalf of	Related draft Plan Strategy Representation
LA03/DPS/CR/0123	Mr. Geoff Simon	Dunadry Community Association	
LA03/DPS/CR/0124	Mr. John Doherty		LA03/DPS/0063
LA03/DPS/CR/0125		HED Department for Communities	LA03/DPS/0094
LA03/DPS/CR/0126		HED Department for Communities	LA03/DPS/0035
LA03/DPS/CR/0127		HED Department for Communities	LA03/DPS/0110
LA03/DPS/CR/0128		HED Department for Communities	Prefixed by LA03/DPS/0004, 0005, 0006, 0023, 0024, 0027, 0028, 0031, 0033, 0039, 0040, 0041, 0043, 0044, 0045, 0052, 0065, 0068, 0069, 0071, 0072, 0078, 0079, 0080, 0084, 0085, 0090, 0095, 0097, 0098, 0099, 0100, 0104, 0105, 0109, 0114, 0120, 0121
LA03/DPS/CR/0129		HED Department for Communities	Prefixed by LA03/DPS/0038, 0089, 0091, 0092, 0093
LA03/DPS/CR/0130	Ms. Rachel Furlong	ScottishPower Renewables	
LA03/DPS/CR/0131	RPS Group	The Hyde Family	LA032/DPS/0063
LA03/DPS/CR/0132	Gravis Planning	Ms. Joyce Bill & Ms. Hazel Bill	LA03/DPS/0015 LA03/DPS/0103 LA03/DPS/0008 LA03/DPF/0054
LA03/DPS/CR/0133	Gravis Planning	Ulster University	LA03/DPS/0015 LA03/DPS/0103 LA03/DPS/0008 LA03/DPF/0054
LA03/DPS/CR/0134	Gravis Planning	Eastwood Estate Agents	LA03/DPS/0015 LA03/DPS/0103

			LA03/DPS/0008 LA03/DPF/0054
LA03/DPS/CR/0135	Gravis Planning	Corbo Properties	LA03/DPS/0015 LA03/DPS/0103 LA03/DPS/0008 LA03/DPF/0054
LA03/DPS/CR/0136	Gravis Planning	Mr. Brian Mc Bride	LA03/DPS/0015 LA03/DPS/0017 LA03/DPS/0103 LA03/DPS/0008 LA03/DPF/0054
LA03/DPS/CR/0137	One2One Planning ⁶	NewRiver REIT	LA03/DPS/0081
LA03/DPS/CR/0138	One2One Planning ⁷	Mr. Sloan	LA03/DPS/0109
LA03/DPS/CR/0139	WYG Planning	Mr. Nigel Herdman	LA03/DPS/0075
LA03/DPS/CR/0140	TSA Planning	Belfast International Airport (BIA)	LA03/DPS/0101
LA03/DPS/CR/0141	TSA Planning	Belfast International Airport (BIA)	LA03/DPS/0117
LA03/DPS/CR/0142	TSA Planning	Belfast International Airport (BIA)	LA03/DPS/0118
LA03/DPS/CR/0143	TSA Planning	Belfast International Airport (BIA)	LA03/DPS/0021
LA03/DPS/CR/0144	TSA Planning	Belfast International Airport (BIA)	LA03/DPS/0026
LA03/DPS/CR/0145	O'Callaghan Planning	Mr. Lindsay Martin	LA03/DPS/0095 LA03/DPS/0096
LA03/DPS/CR/0146	WPB Development Planning	CHL (Landowners at Crumlin)	Prefixed by LA03/DPS/0004, 0005, 0019, 0023, 0033, 0035, 0039, 0040, 0041, 0043, 0044, 0050, 0053, 0056, 0067, 0075, 0078, 0085, 0095, 0096, 0100, 0106, 0107, 0108, 0120, 0122
LA03/DPS/CR/0147	MBA Planning	Nutts Corner Circuit Ltd	LA03/DPS/0100
LA03/DPS/CR/0148⁸	One2One Planning	Mr. Simon Hamill, Nutts Corner Enterprise Park	LA03/DPS/0100

⁶ No longer acting as agent (as of 02-03-2021)

⁷ No longer acting as agent (as of 02-03-2021)

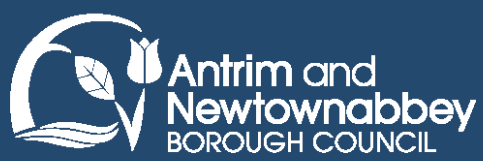
⁸ No longer acting as agent (as of 02-03-2021)

Annex B: List of Abbreviations

Abbreviation	Title
ABCBC	Armagh City, Banbridge and Craigavon Borough Council
ADAA	Antrim and District Angling Association
AOHSV	Area of High Scenic Value
ASSI	Area of Special Scientific Interest
BCC	Belfast City Council
BHP	Belfast Hills Partnership
BIA	Belfast International Airport
BMAP	Belfast Metropolitan Area Plan
CPA	Countryside Policy Area
DADRA	Drumadarragh and District Residents Association
DAERA	Department of Agriculture, Environment & Rural Affairs
DE	Department for Education
DCA	Dunadry Community Association
DfE	Department for the Economy
DfI	Department for Infrastructure
DM	Development Management
DoJ	Department of Justice
DPD	Development Plan Document
DPS	Draft Plan Strategy
DVA	Driver and Vehicle Agency
ELER	Employment Lands Evaluation Report
HED	Historic Environment Division (Department for Communities)
HGI	Housing Growth Indicator
HPGD	Historic Park, Garden and Demesne
dHRA	Draft Habitats Regulations Assessment
IE	Independent Examination

ICNIRP	International Commission on Non-Ionizing Radiation Protection
INI	Invest Northern Ireland
IMF	Indicative Monitoring Framework
LCCC	Lisburn and Castlereagh City Council
LES	Local Employment Site
LDP	Local Development Plan
LLPAs	Local Landscape Policy Areas
LPP	Local Policies Plan
MAPB/GSNI	Minerals and Petroleum Branch/Geological Survey Northern Ireland
MEABC	Mid and East Antrim Borough Council
MPA (NI)	Mineral Products Association (Northern Ireland)
MUDC	Mid Ulster District Council
NED (NIEA)	Natural Environment Division (Northern Ireland Environment Agency)
NIFHA	Northern Ireland Federation of Housing Associations
NIHE	Northern Ireland Housing Executive
NIW	Northern Ireland Water
PAC	Planning Appeals Commission
PAWS	Plantations on Ancient Woodland Sites
PfG	Programme for Government
POP	Preferred Options Paper
PPS	Planning Policy Statement
RDS	Regional Development Strategy 2035
RNIA	Rural Needs Impact Assessment
RSPB NI	Royal Society for the Protection of Birds Northern Ireland
SA	Sustainability Appraisal
SAC	Special Area of Conservation
SCI	Statement of Community Involvement
SEA	Strategic Environmental Assessment

SEL	Strategic Employment Location
SGS	Spatial Growth Strategy
SLNCI	Sites of Local Nature Conservation Interest
SLPA	Strategic Landscape Policy Area
SMWT	Six Mile Water Trust
SP	Strategic Policy
SPG	Supplementary Planning Guidance
SPPS	Strategic Planning Policy Statement
SuDS	Sustainable Drainage Systems
UU	Ulster University
WHO	World Health Organisation
WT	Woodland Trust
WWPS	Waste Water Pumping Station
WWTW	Waste Water Treatment Work



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Antrim Antrim Civic Centre
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www.antrimandnewtownabbey.gov.uk