

Local Development Plan 2030
Preferred Options Paper
Public Consultation Report

June 2019



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Executive Summary

- The Council published its Preferred Options Paper (POP) in January 2017. This was a public consultation document produced to consider key planning issues to be addressed in the Antrim and Newtownabbey Local Development Plan 2030. It set out a range of options for strategic planning matters such as housing, employment lands, settlements and retailing. It set out the Council's Plan Vision and Objectives. The POP also sought views on a range of further planning issues such as development in the countryside, mineral development, renewable energy, waste, along with the historic and natural environment.
- The Council is aware that plans can only be successful if they are rooted in local knowledge and an appreciation of what is important to people within the Borough. Therefore, on launching the POP, the Council opened a 12-week public consultation to engage with the local community and statutory consultation bodies, such as government departments and bodies representing Section 75 groups.
- During this public consultation process, the Council welcomed 149 representations from a wide range of persons and groups regarding various Local Development Plan issues within the Borough. These representations have been used, along with additional evidence sources, to inform the Plan Strategy, and will be considered again in preparation of the Local Policies Plan, where appropriate.
- The main purpose of this POP Public Consultation Report is to outline key issues raised during the public consultation on the Council's POP. The Report then summaries how these issues have been taken into account during the preparation of the Local Development Plan. This is a requirement under The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Part 3, Regulation 11 (4).
- This Report supersedes the Council's POP Interim Consultation Report, which was published in August 2017 to provide an initial brief summary of issues raised during the POP public consultation event. The Interim Report was prepared in order to provide a high-level summary of the main issues raised to inform Elected Members, stakeholders and the general public of the issues received.
- This POP Public Consultation Report was ratified by Council on Monday 29 April 2019.

1 Introduction

- 1.1 The preparation of a new Local Development Plan (LDP) provides an opportunity to continue shaping the Borough into an attractive and diverse place in which to live and work. The LDP can encourage the facilitation of a Borough that all citizens can take pride in, and one that is appealing to new residents, investors, and visitors alike, with improved job opportunities, housing availability, and connectivity that meets the needs of the Borough's communities.
- 1.2 The Council's LDP will seek to ensure that development will be sustainable and of high quality, and will address the ongoing challenges of climate change. Further to this, the LDP will also seek to ensure the Borough's rich built and natural environment will continue to be of high quality and well looked after. The LDP will support the Borough's prosperity and economic development, and enable the provision of a wide range of recreational and leisure activities.
- 1.3 The LDP will comprise two documents that are prepared in sequence. The first is the Plan Strategy, which will be followed by the Local Policies Plan. The Plan Strategy outlines the Plan Vision and Strategic Objectives for the Borough up to 2030, along with a Strategic Growth Strategy and Strategic and Detailed Policies. The Local Policies Plan will contain site-specific proposals for the use of land within the Borough.
- 1.4 The Council is committed to meaningful engagement and recognises that the success of the LDP and its aforementioned role lies in the application of local knowledge and an appreciation of what is important to the people of the Antrim and Newtownabbey Borough. The publication of the Council's Preferred Options Paper (POP) in January 2017 was the first formal stage in gathering stakeholder's views on key planning issues within the Borough.
- 1.5 The POP was a public consultation document that was designed to stimulate discussion among stakeholders on key planning issues within the Borough. It presented varying options on how to address these planning issues, and outlined the Council's Preferred Options for the LDP approach and the reasoning for this position. The POP was supported by the publication of supplementary documents, comprising:
 - A POP Summary Booklet;
 - Meeting the Needs of Society Evidence Paper;
 - Facilitating Economic Development Evidence Paper;
 - Shaping our Future Evidence Paper;
 - Review of Operational Planning Policy Evidence Paper;
 - Annual Housing Monitor 2015;
 - Sustainability Appraisal Interim Report, incorporating Strategic Environmental Assessment and Habitats Regulation Assessment;

- Sustainability Appraisal Scoping Report, incorporating Strategic Environmental Assessment; and
 - Equality Screening Assessment Interim Progress Report.
- 1.6 The purpose of this POP Public Consultation Report is to set out a summary of the main issues raised by stakeholders during the 12-week public consultation on the Council's POP. This Report also outlines how these issues have been taken into account during the preparation of the LDP Plan Strategy. This is a requirement under The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Part 3, Regulation 11 (4). For ease of reference, this Report is structured under the same headings as the POP.
- 1.7 This Report is published alongside the Council's Plan Strategy and will be submitted to the independent examiner as required under The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Part 5, Regulation 20 (2)(f).
- 1.8 Following the publication of the Council's POP and its public consultation period, a Preferred Options Interim Consultation Report was published in August 2017. This provided a brief summary of the main issues that had arisen from the POP public consultation. Although this was not a legislative requirement, the Council considered publishing an interim report to be good practice, providing interested parties with an early indication of the main issues raised as part of the POP public consultation. The Interim Consultation Report has now been superseded by this POP Public Consultation Report.
- 1.9 The consideration of POP representations has been part of the process of updating the evidence base that informed the Plan Strategy. Where relevant, some responses will also be considered at the Local Policies Plan Stage of the LDP.
- 1.10 This POP Public Consultation Report was presented to, and was ratified by, the Council on Monday 29 April 2019, as required by the Council's Statement of Community Involvement.

2 Public Consultation Notification

- 2.1 The Council is aware that any plan can only be successful where it is rooted in local knowledge and an appreciation of what is important to people within the Borough. Therefore, on launching the Preferred Options Paper (POP), the Council opened a 12-week public consultation period to engage with the local community, statutory consultation bodies, such as government departments, along with other bodies, such as the Education Authority and the Northern Health and Social Care Trust. This was in accordance with the Council's Statement of Community Involvement and The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

- 2.2 The POP was a public consultation document. It set out the key strategic planning issues for the Borough and identified a range of options available to address these issues, together with defining the Council's Preferred Options. It was the first formal document to be produced in the preparation of the new Local Development Plan (LDP).
- 2.3 The public consultation on the POP was intended to provide all stakeholders with the opportunity to put forward their views and influence the direction of the new LDP from the outset. These stakeholders include residents and visitors to the Borough, planning consultants, along with statutory and non-statutory consultation bodies, such as government departments and bodies representing Section 75 groups.
- 2.4 It is a statutory requirement under Part 1 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, that the Council consults a number of bodies. These groups are listed below:
- Northern Ireland government departments;
 - Adjoining Councils;
 - Water or sewerage undertaker;
 - The Northern Ireland Housing Executive;
 - The Civil Aviation Authority;
 - Any person to whom the electronic communications code applies by virtue of a direction given under section 106(3) of the Communications Act 2003;
 - Any person to whom a license has been granted under Article 10(1) of the Electricity (Northern Ireland) Order 1992; and
 - Any person to whom a license has been granted under Article 8 of the Gas (Northern Ireland) Order 1996.
- 2.5 Section 75 of the Northern Ireland Act 1998, Equality of Opportunity also places a statutory requirement on each public authority to carry out their functions with due regard to the need to promote equality of opportunity between:
- Persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
 - Men and women generally;
 - Persons with a disability and persons without; and
 - Persons with dependants and persons without.
- 2.6 This legislation further clarifies that public authorities shall, without prejudice to its obligation under subsection 1, in carrying out its functions relating to Northern

Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

- 2.7 The Council issued correspondence to all statutory consultation bodies and Section 75 groups as identified through the Council's Communications and Customer Service Team's database in order to fulfil its statutory obligations.
- 2.8 The public consultation took many forms in an effort to reach all communities within the Borough. The Council ensured alternative formats of the POP and its supplementary documents were available on request, such as in large print, audio format, or in minority languages to meet the needs of those for whom English is not their first language.
- 2.9 Methods of consultation included public engagement events, advertisements and web-based consultation. A varied approach to engagement was taken to ensure that the consultation was widely accessible. These are now summarised in turn.

Launch Event

- 2.10 The formal launch of the POP took place on the morning of Wednesday 18th January 2017. Elected Members of Antrim and Newtownabbey Borough Council, members of the various working groups that the Council's Planning Officers are involved in, the Council's Heads of Service (including the Community Plan team), and representatives from neighbouring council areas were invited to Mossley Mill. There they heard an address from the Mayor, were provided with a hard copy of the POP and were free to ask Planning Officers any initial questions that they had. There followed a photo call for further publicity, and a light breakfast. A copy of the POP Launch invitation can be found at Appendix 1.

Advertisement

- 2.11 In accordance with the Council's Statement of Community Involvement and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the POP public consultation was publicly advertised. A press release was launched on the 19th January 2017 on the Council's website. This press release included quotes from the Mayor's launch event address, a brief introduction to the Preferred Options Paper and Community Plan and links to further information. Screenshots from the press release published on the Council's website can be found at Appendix 2.
- 2.12 A public notice was placed in the Antrim Guardian and Newtownabbey Times. This notice included an invite to comment within the 12-week public consultation period, details of all public engagement events and also highlighted that a number of other planning documents had been published (Sustainability Appraisal Interim Report, Equality Screening Assessment Interim Progress Report etc.) (Appendix 2).

Borough Life Magazine

- 2.13 The POP was also advertised within the Council's '*Borough Life*' magazine, a hard copy of which issued to every household and business in the Borough. It is produced on a quarterly basis and information regarding the POP featured in the March 2017 edition. The full-page magazine article gave a brief overview, as well as providing detail on how to become involved in the public consultation process (Appendix 3). The POP public consultation was reiterated in the 'Mayor's Message' at the beginning of the magazine.

Display Exhibitions

- 2.14 POP display exhibitions were set up in prominent places in the public reception area at the Council's two principal offices, Mossley Mill and Antrim Civic Centre for the duration of the public consultation event. These displays made available hard copies of the POP, community involvement forms, summary booklets along with all other relevant POP documentation. Planning Officers were on hand to answer any queries.
- 2.15 Photographs of the displays are included at Appendix 4.

Posters and Summary Booklets

- 2.16 Posters of A3 and A4 size were distributed to a number of Council facilities across the Borough, including community and leisure centres. These posters gave details of the Council's website for further information.
- 2.17 Summary booklets were also designed and published following customer and staff feedback from drop in events. These A5-sized booklets gave a broad overview of the information within the POP in a shorter, simpler and easier to read format. For consistency and recognition, the posters and summary booklets were of a similar branding to the original POP document. Appendix 5 presents the poster and front cover of the summary booklet.

Public Engagement Events

- 2.18 The Council held seven drop-in sessions in seven different locations across the Borough. These events were arranged at varied times aiming to facilitate a wide range of residents. Planning Officers were on hand to explain the display boards and answer questions, and there was free consultation summary material and hardcopies of the POP available to take away. There was a varied attendance rate at these sessions with the minimum number of people in attendance being 4 and the maximum 20.
- 2.19 Details of the Public Engagement Events can be seen in the table below and a photograph of the typical event set-up can be seen at Appendix 6.

Preferred Options Paper Drop-In Sessions

Venue	Event Type	Date	Time
Neillsbrook Community Centre	Drop-In	Tuesday 31 January 2017	16:00 – 19:00
Lilian Bland Pavilion	Drop-In	Thursday 2 February 2017	10:00 – 13:00
Valley Leisure Centre	Drop-In	Friday 3 February 2017	13:00 – 16:00
Crumlin Leisure Centre	Drop-In	Tuesday 7 February 2017	12:00 – 15:00
Old Courthouse, Antrim	Drop-In	Thursday 16 February 2017	16:00 – 20:00
Ballyclare Town Hall	Drop-In	Tuesday 21 February 2017	10:00 – 13:00
Mossley Mill	Drop-In	Thursday 23 February 2017	09:00 – 20:00

Correspondence

- 2.20 The table below provides a summary of correspondence issued by Planning Officers to stakeholders regarding the launch of the Council's Preferred Options Paper.

Correspondence

Contacted	Date	Correspondence Type
Statutory Consultees	18 January 2017	Letter
Working Group Member	18 January 2017	Email
	25 January 2017	Letter and Hard copy of POP
Section 75 Groups	18 January 2017	Letter
Site Specific Representations ¹	17 January 2017	Letter
Members	January 2017	Email Invitation and Calendar Invite
	18 January 2017	Email and Hard copy of the POP
Community Involvement Form List ²	18 January 2017	Letter
GROW South Antrim Local Action Group	1 February 2017	Email
Additional Consultees	8 February 2017	Letter
	22 February 2017	Letter
	22 March 2017	Letter
	14 March 2017	Email

- 2.21 The letters and emails raised awareness of the public consultation and provided details on drop-in sessions as well as ways to submit a response. Elected Members

¹ A number of site-specific representations were submitted to the Planning Section prior to the Preferred Options Paper public consultation. The Planning Section has not requested site representations. Such representations are being held for information purposes only and without prejudice at the present time.

² The Council holds a Local Development Plan Community Involvement database for persons interested in the planning process in order to keep them informed of key plan stages. Further details are at www.antrimandnewtownabbey.gov.uk.

and Working Group members also received hard copies of the document in line with the Statement of Community Involvement.

Internal Communications

- 2.22 An email was sent to all staff members working within the Community Planning and Regeneration Department notifying them of the publication of the POP. This email also gave details on how to become involved and provided links to the webpage. Staff were also encouraged to forward the email to any community groups that would have an interest in planning.

Social Media

- 2.23 Both Twitter and Facebook were used to publicise the POP. The Forward Plan Team worked together with the Communications & Customer Services section within the Council to devise appropriate posts that were issued via the Council's social media accounts throughout the 12-week public consultation period. This helped to raise awareness of the publication, its consultation period and the drop in sessions, as social media is increasingly becoming a more effective means of communicating with the wider community.
- 2.24 Please see Appendix 7 for screenshots from social media.

Web based Consultation

- 2.25 The Council's website provided a link to the Consultation Hub for the POP and associated documents. The link was located on the Planning Section of the Council website under the Local Development Plan subsection. The hyperlink directed users to the Citizen Space Consultation Hub where they could make comments online via the online survey questionnaire. Screenshots from the Consultation Hub can be viewed at Appendix 8.

3 Consultation Responses

Methods of Response

- 3.1 Following on from the above notifications of the Preferred Options Paper (POP) launch and the opening of the 12-week public consultation process, the Council ensured there were a number of ways that people could make comments. Details regarding the various methods were documented on all public consultation materials as well as on any correspondence issued.
- 3.2 Links to the Council's Forward Planning webpage and contact details for the Planning Section were provided. While the Council encouraged the submission of comments through the online public consultation portal, comments could also be submitted via letter and email.
- 3.3 Whilst only written representations could be legally accepted, Council officers were available to answer questions on the consultation at drop-in events, over

the telephone and in person at Mossley Mill and Antrim Civic Centre. The consultation aimed to be as inclusive as possible and reach a wide range of people and communities.

- 3.4 The table below summarises who responded to the POP and the format in which the Council received the comments.

Response Summary

Origin of Response	Nature of Response	Number of Responses	Total Number of Responses
Statutory Consultation Bodies	Hard Copy or Email	20	23
Non-Statutory Consultation Bodies	Hard Copy or Email	3	
Members of the Public / Agents	Online Consultation	37	126
	Hard Copy or Email	89	

Statutory Consultees

- 3.5 In line with Part 1 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, a total of 139 statutory consultees were consulted. A list of the statutory consultees, together with their reply status can be seen at Appendix 9.

Equality Screening Assessment Interim Progress Report

- 3.6 An Equality Screening Assessment Interim Progress Report was published alongside the POP, and its 12-week public consultation ran simultaneous to the POP public consultation period.
- 3.7 No responses were received in relation to the Equality Screening Assessment Interim Progress Report.

Sustainability Appraisal Interim Report

- 3.8 A Sustainability Appraisal Interim Report was published alongside the POP, and its 12-week public consultation ran simultaneous to the POP public consultation period.
- 3.9 Four responses were received that were specifically in relation to the Sustainability Appraisal Interim Report. These were outlined in the POP Interim Consultation Report, August 2017, and have been considered in the draft Sustainability Appraisal Scoping Report (incorporating a Strategic Environmental Appraisal), which was published alongside the Plan Strategy.

Site-Specific Representations

- 3.10 The POP did not specifically seek representations relating to lands for consideration in the Local Development Plan (LDP) process, as this is a matter

for the Local Policies Plan stage. However, 55 POP representations contain a site-specific element, where requests were made for land to be included for development purposes, such as housing or employment lands. The site-specific POP representations will be held by the Council without prejudice for information purposes only until such times as the Local Policies Plan is being prepared. A preliminary review of those site-specific representations that relate to a Strategic Employment Location designation were initially considered during the preparation of the Plan Strategy.

- 3.11 The Council has encouraged stakeholders to register on the Community Involvement database in order to be notified, should the Council request a formal call for sites to be considered at the Local Policies Plan stage.

4 Main Issues and Consideration

- 4.1 This POP Public Consultation Report now summarises the main comments received during the POP public consultation. For ease of flow, these considerations have been structured under the main headings of the POP. Explanation is given as to how the issues raised were considered when preparing the Plan Strategy.

5 Plan Vision and Objectives – Main Issues Raised

- 5.1 The Council's Local Development Plan (LDP) requires a clear Plan Vision as to what the Antrim and Newtownabbey Borough should look like by 2030. To deliver this Plan Vision, the LDP will also require interlinked Strategic Objectives (SOs). The Preferred Options Paper (POP) presented the Council's proposed Plan Vision and Plan Objectives, and invited comments. The main comments made during the POP public consultation relating to these are as follows:

PLAN VISION & OBJECTIVES	
Main Comments	Consideration
Support for the LDP Aim (<i>sic</i>) and Objectives. They are forward thinking and incorporate principles of sustainable development.	The Council welcomed the support for its overarching long-term spatial Plan Vision and accompanying Plan Objectives for the Borough. Since the POP, Planning Officers have reviewed and refocused these, which are now referred to as ' <i>Strategic Objectives</i> ', to accurately reflect the wider role of the LDP and provide logical flow to meet the three pillars of sustainable development.

<p>The LDP Vision and Objectives should place more emphasis on protecting and enhancing the landscape, heritage, and the environment, and incorporate high quality, environmentally sustainable design. It should also include cultural heritage.</p>	<p>The Council recognises the contribution of the Borough's natural heritage and historic environment. This has been reflected in the Plan Strategy and will be continued to be addressed in the Local Policies Plan. The Borough's rich cultural heritage is spatially reflected in the natural heritage and historic environment planning policies within the Plan Strategy.</p>
<p>The Plan Vision could be amended to demonstrate enhanced ambition for the Borough.</p>	<p>The Council considers the Plan Vision to be ambitious and adequately provides a clear vision as to what the Borough should look like in 2030. It encompasses the key priorities and objectives of the Council's Corporate and Community Plans.</p>
<p>Plan Objectives could be worded to ensure that they are more detailed, inspiring, relevant and meaningful, and aligned with the Council's Community Plan and regional policy set out in the Regional Development Strategy (RDS), the Strategic Planning Policy Statement (SPPS), and other policy and guidance issued by the Department for Infrastructure.</p>	<p>The Council considered it appropriate to reword the POP Plan Objectives (now referred to as '<i>Strategic Objectives</i>', in light of examination of further evidence and the comments received during the POP public consultation. They now reflect the wider role of the LDP. The amended wording has been included in the Plan Strategy.</p> <p>Throughout the Plan Strategy, the Council has taken account of its Community Plan, along with current regional policy and guidance. This is detailed within the Plan Strategy, supporting Evidence Papers and this POP Public Consultation Report.</p>
<p>LDP Objectives should be more spatially specific – particularly with relevance to the Spatial Growth Strategy.</p>	<p>The Council agreed with this comment and has revised the wording of the POP Plan Objectives (now known as '<i>Strategic Objectives</i>' to spatially reflect the Borough's requirements in fulfilling the Plan Vision for 2030. Strategic Objective 1 is particularly relevant to the Spatial Growth Strategy, '<i>Promote sustainable growth by managing development and securing new infrastructure provision in our settlements</i></p>

	<i>and countryside to meet the needs of all our citizens.'</i>
LDP Objectives should be more reflective of how they will be delivered, measured and monitored in terms of furthering sustainability. The objectives do not go far enough to meet the biodiversity duty placed on public bodies.	<p>The Council is committed to facilitating sustainable development where its role permits, for instance, the LDP is based on sustainable development principles, with the Strategic Objectives detailing how this can be enabled. This includes a specific Strategic Objective (SO 11) to include the promotion of biodiversity.</p> <p>The Council recognises the value of monitoring to establish how the Strategic Objectives are being achieved and if any changes are required. The Council will therefore undertake a programme of monitoring, as set in legislation. Key indicators include the uptake of housing and employment land, and environmental protection. Further information on LDP monitoring can be found within Appendix C of the Plan Strategy.</p>
A separate LDP Objective relating to the management of flood risk should be included.	<p>The Council has updated its POP Plan Objective <i>'To integrate climate change adaption requirements such as flood prevention...'</i>, to be more specific regarding flood risk and Strategic Objective (SO 13) now states, <i>'Tackle flood risk by making space for water and promote sustainable urban drainage systems'</i>.</p> <p>This Strategic Objective will be implemented through Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies, with background information in Evidence Paper 14: Flooding.</p>
Support for the Council's recognition of the contribution that can be made by maximising the low carbon economy. The Objective relating to renewable energy should not be limited to renewable generators but also include ancillary services that facilitate the deployment of	The Council welcomed these comments and recognises that the Borough has significant potential for renewable energy production and Grid connection. The LDP can enable the promotion of low carbon lifestyles, using renewable energy and improving renewable energy infrastructure.

<p>renewables, including but not limited to storage and transmission of renewables.</p>	<p>Subsequent to the POP and these public consultation representations, the Council has included Strategic Objective (SO 12), which has been worded to emphasise the responsible use of land and natural resources, which can be applied to renewable proposals, including infrastructure and the provision of ancillary services.</p>
<p>Some respondents considered there should be a reduction in the number of LDP Objectives to ensure that they remain succinct and focused, while others thought there should be additional objectives.</p>	<p>The Strategic Objectives have been reviewed to demonstrate how the LDP's over-arching and long-term Plan Vision will be supported and achieved, as well as reflecting the three pillars of sustainable development.</p>
<p>While the delivery of affordable housing is welcomed, Objective 5 should be reworded to say 'generous' rather than 'sufficient', and 'mainstream' should be replaced with 'mixed tenure'.</p>	<p>The Council has considered these comments and has subsequently reworded this Strategic Objective to provide a more precise representation of how the Plan Vision will be realised in terms of residential development. The aim of the relevant Strategic Objective envisages the Borough with a <i>'diverse choice of housing'</i> to cater for all tenures.</p> <p>In terms of supply, the Council undertakes an annual programme of monitoring to analyse the uptake of housing land. The Council is committed to ensuring there is an adequate and available supply of quality housing land, in line with current regional planning policy.</p>
<p>Evidence paper refers to the importance of access for all yet this fails to pull through comprehensively into the Vision and Objectives. There should be stronger focus on the need for accessibility for all in open space, leisure, recreation or community provision.</p>	<p>The Council recognises the need to encourage inclusive access for all members of society and as such has included Strategic Objective 6, which aims to <i>'improve accessibility, connectivity and ease of movement to, from and within our Borough and promote sustainable travel choices'</i>. Strategic Objective 10 also promotes the protection and accessibility of the Borough's open spaces.</p>

These Strategic Objectives will be enabled through the implementation of planning policy, including Strategic Policy 3: Transportation and Infrastructure, and Strategic Policy 6: Placemaking and Good Design. Their related Detailed Policies include requirements for new development to 'demonstrate accessible and inclusive places for all'.

6 Spatial Growth Strategy – Main Issues Raised

- 6.1 Spatial planning is about how to manage the development of space to meet the needs of society, the economy, the environment, and create better places for people to live and work in. To this end, the Council's Local Development Plan (LDP) Plan Strategy indicates how future growth will be accommodated across the Borough. This section considers comments received during the Council's Preferred Options Paper (POP) public consultation, which relate to the options for spatial growth, hierarchy of settlements and centres, the Strategic Employment Locations, Belfast International Airport, and the countryside.

Hierarchy of Settlements

- 6.2 The POP Preferred Option for classifying the Borough's existing settlements included a six-tier structure, with Metropolitan Newtownabbey and Antrim in the top two tiers. Ballyclare was distinguished as a large town, whilst Crumlin and Randalstown remained as towns. The Council considered that the Preferred Option took account of the Regional Development Strategy (RDS). Main comments received during the POP public consultation regarding Spatial Growth Strategy and the Settlement Hierarchy within the Borough include the following:

HIERARCHY OF SETTLEMENTS	
Main Comments	Consideration
Support for the Settlement Hierarchy and the distinction between Ballyclare and other Borough towns. There was agreement that Metropolitan Newtownabbey is in the top tier, given its population and employment/ commercial focus.	<p>The Council welcomed this support for the POP Settlement Hierarchy, the structure of which was guided by current regional planning policy. This Settlement Hierarchy will deliver the Borough's growth in a sustainable manner.</p> <p>Subsequent to the POP, Planning Officers updated the evidence base in line with Departmental guidance, and conducted</p>

	<p>a further analysis of the Settlement Hierarchy. A summary of this review is included in Evidence Paper 2: Settlement Evaluation, which supplements the Plan Strategy. The Settlement Hierarchy presented in the Plan Strategy retains the distinction between the higher tiered settlements to reflect their individual role, function, and population.</p>
<p>Support for the Spatial Growth Strategy, particularly in sustaining and maintaining the role of our villages as local service centres.</p>	<p>The Council acknowledges the importance of recognising the individual role and function of each settlement within the Borough and has brought forward a Spatial Growth Strategy to reflect this. This includes support for the villages in the Borough including a number of policies to sustain their role as important service centres for the rural community.</p>
<p>Some respondents considered that the identified six-tier Option is excessive and justification for the hierarchy is not consistent with planning policy, whereas others thought a further 'small town' category should be introduced.</p>	<p>The Council considers the POP Preferred Option of a six-tier hierarchy as robust, and a further review has included the Borough's countryside as an additional tier. The Settlement Hierarchy as presented takes account of a number of considerations, including:</p> <ul style="list-style-type: none"> • the RDS (including the Hierarchy of Settlement and Related Infrastructure Wheel); • the classification of settlements in the Borough's inherited legacy area plans; • the Review of Statistical Classification and Delineation of Settlements (NISRSA, March 2015); • the population size, role and function of the various settlements; and • the changed circumstances since the publication of legacy area plans. <p>With regard to the above-mentioned regional guidance and updated evidence base, the Council subsequently did not consider it necessary to include an additional 'small town' tier, as there is sufficient distinction between the Borough's large town and town tiers.</p>

<p>Assessment of proposed new settlements, or growth to existing settlements should consider accessibility and the availability of adequate infrastructure and provision of services including water and sewerage.</p>	<p>The Council undertook a Settlement Hierarchy and Strategic Settlement Analysis in line with the RDS Housing Evaluation Framework (RDS, Table 3.2), which looked at issues including infrastructure and services. Planning Officers also liaised with key consultees in relation to infrastructure provision. The findings of the analysis have shaped the Plan Strategy Strategic Policy 1: Sustainable Development, and related Detailed Policies, along with other supporting Strategic Policies such as Homes (SP 4) and Employment (SP 2). These policies confirm that the majority of growth will take place in larger settlements, where supporting infrastructure is in place.</p>
<p>While there is a request for the open countryside to be included in the Hierarchy of Settlements as a large population was being ignored, there were requests for clarification needed on the approach to development in the countryside. Some respondents considered the countryside requires a high level of protection from excessive and inappropriate development.</p>	<p>On reviewing current regional planning policy and current evidence, the Council considered it appropriate to include the Borough's countryside as a tier within the Plan Strategy Settlement Hierarchy. Further to this, the Plan Strategy brings forward a number of supportive Strategic Objectives, including Strategic Objective 1, which aims to promote sustainable growth in the countryside through the appropriate management of development.</p> <p>The Council also updated its evidence base in line with Departmental guidance by undertaking a number of studies in the countryside, including a Landscape Character Assessment. This has been reflected in the number of designations such as Areas of High Scenic Value and Landscape Policy Areas, which seek to protect the countryside from excessive and inappropriate development. The boundaries of these areas will be defined in the Local Policies Plan stage.</p> <p>In addition to this, the Council has brought forward the majority of legacy planning policies that relate to sustainable development in the countryside.</p>

<p>Need to focus on furthering sustainable development.</p>	<p>The support for furthering sustainable development is welcomed by the Council, and has been taken forward in the LDP, in line with current regional policy and guidance. The LDP has also been subject to Sustainability Appraisal, incorporating a Strategic Environmental Assessment.</p>
<p>Regard must be made to the growth strategy and implications for other LDPs of adjoining Council areas in the context of the Belfast Metropolitan Area.</p>	<p>Throughout the development of the LDP, the Council has held, and will continue to be involved in, cross boundary collaborations with neighbouring Councils. It has also taken account of the RDS, which sets the regional position for sustainable growth in Northern Ireland.</p> <p>In addition, in line with soundness tests C4 and CE1, the Council has considered neighbouring Council proposals and cross boundary issues, and if there is any potential incompatibility. The Council has also liaised with key infrastructure providers to ensure the Borough's growth does not have a detrimental impact on the overall provision of necessary infrastructure in the greater Belfast Region.</p>
<p>There has been a disproportionate amount of growth in smaller settlements, which is not in keeping with Regional Development Strategy (RDS) guidance SFG 12: <i>Grow the population in the Hubs and cluster of Hubs.</i></p>	<p>The Council acknowledges that the RDS directs the focus for population growth on Hubs and clusters of Hubs, and that Antrim is identified in the RDS as a Main Hub, which is also in a cluster with Ballymena and Larne. The Council's Plan Strategy includes Strategic Objective 1, which commits to promoting sustainable growth by managing development and securing new infrastructure provision in the Borough's settlements and countryside to meet the needs of citizens.</p> <p>In line with current regional policy and guidance, the Council has committed to allocate housing growth based on the role and function of a settlement, its position in the Settlement Hierarchy, and its capacity to accept new residential development. Further information is available in Strategic Policy 4: Homes, related Detailed Policies, and supporting Evidence Paper 6: Housing.</p>

	In terms of employment, the Council has taken a similar approach, in that Strategic Employment Locations will be located in the higher tier settlements. Further information on the distribution of employment land is available in Strategic Policy 2: Employment, related Detailed Policies, and supporting Evidence Paper 3: Economic Growth.
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Hamlets

- 6.3 The POP Preferred Option proposed hamlets to be included at the end of the POP proposed six-tier Settlement Hierarchy, beneath villages. It designated Ballyeaston as a hamlet due to its size, role and function. The POP also proposed the designation of 'new' hamlets that were based on existing clusters of dwellings in the countryside, and asked stakeholders if any other areas should be considered. Main comments received during the POP public consultation in relation to hamlets include the following:

Hamlets	
Main Comments	Consideration
While there was support for new hamlets, there was also disagreement with the rationale employed for the designation of new hamlets – could lead to unsustainable development in the countryside.	<p>The Council has considered these concerns and, following a Settlement Hierarchy and Strategic Settlement Analysis to examine this approach. This LDP position is outlined in Plan Strategy Strategic Policy 1: Sustainable Development, along with related Detailed Policies.</p> <p>During an extensive analysis of the Borough, Planning Officers have identified twenty-eight locations as hamlets within the Plan Strategy. Twelve of these are 'new' settlement designations that identify existing clusters that were not previously identified in legacy area plans. Whilst a number of the retained hamlets identified do not possess any community facilities or services, they have been included, as they have been identified as hamlets in legacy area plans.</p> <p>The Council considers that the designation of hamlets will not lead to</p>

	<p>unsustainable development in the countryside by ensuring opportunities for development are limited, and restricting inappropriate and unsustainable expansion into the surrounding area. Development opportunities will be limited to infill and small-scale rounding off.</p>
<p>Support given to recognise new hamlets as listed, particularly Aldergrove, Creavery, Gortgill, Rathmore, and Straidhaven.</p> <p>Some respondents said consideration should also be given to the designation of additional hamlets – particularly Muckamore, Dunsilly, The Diamond, Ballyearl, Straid Dam, and Orpins Mill.</p> <p>One considered that Rathmore and Newmill should not be designated as they have less of a community aspect.</p> <p>There were comments that Ballyeaston should not be classified as a hamlet, but be identified as a village as in legacy area plans, and a response that Lowtown is too small to be classified as a hamlet.</p>	<p>The Council welcomed this support for the recognition of new hamlets identified in the POP. Planning Officers subsequently updated the evidence base in line with Departmental guidance with a Strategic Settlement Analysis for each of these suggested locations. It was concluded that the following locations are consistent with the hamlet tier of the Plan Strategy Settlement Hierarchy:</p> <p>Aldergrove</p> <p>This location has a number of facilities that provide a community service. These services are located around a crossroad junction, which provides a notable focal point.</p> <p>Ballyeaston</p> <p>The POP proposed that the settlement be classified as a hamlet. This stimulated much debate among stakeholders, and Planning Officers completed further evaluation of Ballyeaston within the Strategic Settlement Analysis. This assessment confirmed that the settlement is consistent with the hamlet tier. The Council considered that the population at less than 100, in conjunction with the level of services available would result in an unsustainable disparity between Ballyeaston and the other, considerably larger settlements within the village tier.</p> <p>Creavery</p> <p>This location involves a linear cluster of residential development, including Creavery Terrace, and a number of community facilities, consisting of Creavery Gospel Hall and associated car</p>

parking, a joinery business and a trotting stadium. Creavery Sewage Pumping Station is located adjacent to the small car park associated with The Ramble Inn.

Gortgill

Within the primary node (Roguary Rd & Cloghogue Rd), there is a petrol filling station and associated shop, and the former 'Gortgill School' building that has become a community hall. A secondary node is formed at the junction of the Roguary Road and Loughbeg Road. Located at this node there is a small convenience store with a Post Office, a hair salon, as well as a community hall, and a number of private businesses.

Lowtown

Lowtown was identified as a small settlement in the legacy Belfast Metropolitan Area Plan. Lowtown does not presently have community facilities but the sense of cohesion and place is apparent. It is the position of the Council to bring forward legacy hamlets, as these locations are recognisability different to the surrounding countryside.

Newmill

The Council's Strategic Settlement Analysis demonstrates the location is consistent with the characteristics of a hamlet. There is a large cluster of housing that has historically centred at a junction, around a mill complex. This offers a sense of place that sets it apart from the surrounding rural area. An Orange Hall acts as a community facility.

Rathmore

When evaluated by Planning Officers, this location was found to offer a significant cluster of residential development along with a range of community facilities and services, including a gospel hall, boarding kennels, groomers, and remote control car-racing track. A sports pitch and Orange Hall is located on the opposite side of Loughanmore Road in

the area known as Burnside. The Council subsequently considered it appropriate for Rathmore to be included as a hamlet.

The Diamond

When Planning Officers examined this location, it was found to contain a number of dwellings in two potential nodes. There is a distinct sense of place and change in character from the surrounding rural area. There is an Orange Hall for community facilities. The Council has considered it is appropriate to be included as a hamlet.

During the POP public consultation process, there were a number of suggestions for new hamlets to be identified. However, when Planning Officers evaluated the following suggested locations, it was considered that they did not have a role and function consistent with a hamlet, as defined in the Council's LDP. These suggested locations included:

Ballyearl

The Council recognises that there are a number of dwellings at this location; however, they are primarily presented in a linear fashion, fronting the Doagh Road and lack a focal point or sense of place or cohesion. Community facilities include allotments, and the Council's Ballyearl Arts and Leisure Centre. However, this area is located adjacent to the boundary of Metropolitan Newtownabbey and the Council considers it would be inappropriate to designate a hamlet that abuts the limits of the metropolitan urban area.

Dunsilly

Planning Officers evaluated this location and it has been determined that while the hotel complex could act as a community facility, the surrounding dwellings are significantly dispersed and therefore the location lacks a sense of

place and distinct change of character from that of the rural landscape. The location has therefore not been included within the Plan Strategy Settlement Hierarchy.

Muckamore

Whilst this location has a grouping of buildings, which represent a sense of place, there are no community facilities.

Orpins Mill

Planning Officers evaluated this location and determined dwellings are too dispersed to offer a sense of place and character distinctly different from the rural landscape. There were no community facilities evident. The location has subsequently not been included within the Plan Strategy Settlement Hierarchy.

Straidhaven

This location was identified as a potential hamlet in the POP, and received some support for this designation during the public consultation. However, on reflection when Planning Officers undertook their detailed Strategic Settlement Analysis and re-evaluated the location, it was determined that the location lacked sense of place. The character remained similar to that of the surrounding rural landscape, despite community facilities associated with the Primary School. Despite suggesting it in the POP as a point for discussion, the Council considers that on reflection the location does not warrant hamlet status.

Straid Dam

Planning Officers included this location within their Strategic Settlement Appraisal. The cluster of farm buildings and community facility associated with the fishery was noted. However, it was determined that buildings were dispersed and the location lacked a sense of place and focal point that is distinctly different to the surrounding rural area. Therefore,

	this location has not been included as a hamlet within the Plan Strategy.
<p>There is insufficient information to determine whether the designation of new hamlets can contribute towards furthering sustainable development.</p> <p>There is no reference to the environmental capacity of these locations to absorb further development, or any commitment to steer development away from sensitive areas.</p> <p>Gortgill is an area for wintering whooper swans, which feature in the Lough Beg Special Protection Area and should be considered when designating as a hamlet.</p>	<p>It is notable that settlements identified in the Plan Strategy are already in existence. The LDP is recognising what has developed over time, and its role is to ensure any future development is sustainable and appropriate.</p> <p>The Council considers that the designation of these locations as hamlets is in line with current regional planning policy in terms of sustaining rural communities, and will not lead to unsustainable development in the countryside. Throughout each stage of the LDP preparation to date, proposals for settlements have been subject to Sustainability Appraisals, which concluded no significant negative effects were identified. The LDP has also been subject to a Habitats Regulations Assessment to determine any impact on important habitats.</p> <p>The designations will ensure opportunities for development are limited, and will restrict inappropriate expansion into the surrounding area. The size of hamlets will be identified at Local Policies Plan stage. Development opportunities will be limited to infill and small scale rounding off.</p> <p>In terms of the environmental capacity to absorb further development, Planning Officers completed detailed survey work for each settlement within the Plan Strategy. This fieldwork noted a range of factors including the landscape character, and national, regional and local environmental designations. These Settlement Appraisals have been used in a twofold manner to firstly inform the Settlement Hierarchy, and secondly to ensure the designation of appropriate settlement development limits at Local Policies Plan stage.</p>

<p>New policy will be required to control development within the existing and newly designated hamlets.</p> <p>Some respondents considered additional information was required on newly identified hamlets, such as functions performed, proposed settlement limits, etc.</p>	<p>The main purpose of designating hamlets within the LDP is to control the level of development within the countryside, and to ensure what development occurs, is sustainable. Whilst there may be opportunities for limited development, such as infill or small-scale rounding off, inappropriate expansion into the surrounding countryside will be restricted. The Local Policies Plan will detail development limits and any design considerations.</p> <p>Subsequent to the POP, Planning Officers updated the evidence base by conducting a Strategic Settlement Analysis throughout the Borough in order to collate and evaluate additional information regarding the role and function of each settlement. Initially, this information has been used to inform the Plan Strategy Settlement Hierarchy, and will also be used as a basis for determining development limits at Local Policies Plan stage.</p>
<p>Uncertainty about how the identification and designation of new hamlets would align with the proposed Hierarchy of Settlements.</p>	<p>Current regional planning policy recognises smaller settlements and the need to establish the role of these locations (<i>RDS SFG 13/14; SPPS para.6.73, point 9</i>). The Council considers this approach to be sound, and as such has included these smaller settlements as a tier within the Plan Strategy Settlement Hierarchy.</p> <p>The legacy area plans used differing terms for these settlements, with AAP designating 'hamlets', and BMAP 'small settlements'. The LDP has termed these concentrations of dwellings with at least one community facility, as 'hamlets'. The individual role and function of each settlement has determined where it sits within the Settlement Hierarchy.</p> <p>Further information on the designation of hamlets can be found within Evidence Paper 2: Settlement Evaluation, which supplements the Plan Strategy.</p>

<p>Criteria for designating hamlets should be based upon existing road infrastructure rather than proposed or suggested future road improvements.</p>	<p>In designating hamlets within the Plan Strategy, Planning Officers compiled a robust series of criteria in order to assess the current role and function of each location. This included the provision of existing transportation infrastructure. It should be noted that hamlets identified in the Plan Strategy are existing clusters of development that have evolved over time around existing infrastructure provision.</p>
<p>Concern that designating additional hamlets constitutes rural housing by the 'back door'.</p> <p>It would be more appropriate to control rural housing under planning policy that allows for clusters of housing, avoiding the need to designate new hamlets.</p>	<p>The Council does not support unsustainable forms of development, including that within the countryside, and as such has taken the current regional policy approach of including villages and hamlets within the Plan Strategy Settlement Hierarchy.</p> <p>In addition to this, and in relation to the provision of opportunities for growth in the countryside, the Plan Strategy provides planning policy for development in the countryside, including the siting of residential development within an existing cluster. This approach has taken account of, and is consistent with the policy provisions of the SPPS.</p> <p>The locations identified as hamlets within the Plan Strategy go beyond a mere cluster of housing. They consist of locations where there is a clear sense of place or cohesion that is obviously different to the surrounding rural area. They also possess a limited range of services or facilities, usually one or more. Boundaries will be tight and development opportunities will be limited to infill development. This will prevent unsustainable expansion into the countryside.</p>
<p>The Antrim Area Plan criteria for hamlets appears more robust and suited for protecting the countryside, as more factors are taken into account.</p>	<p>The legacy area plans that cover the Council area were prepared at different times, within different policy and guidance contexts, and therefore applied different settlement classifications. Antrim Area Plan's criteria</p>

	<p>for hamlets assessed the size of the existing settlement, the availability of public sewage disposal facilities, and the existence of facilities other than housing, e.g. a church, shop, community facilities.</p> <p>In contrast, Belfast Metropolitan Area Plan did not explicitly define criteria for the identification of hamlets. However, in the Planning Appeals Commission's <i>'Report on the Strategic Plan Framework of draft BMAP 2015'</i> (para. 2.213, p.17) it identifies what it considers as a hamlet:</p> <p><i>'It would appear that in order to constitute a settlement there should be a concentration of buildings displaying an obvious sense of cohesion and place and offering one or more community facilities.'</i></p> <p>Given that this definition was brought forward in the context of the RDS, the Council considers this approach to be sound, and should be used to formulate the Settlement Hierarchy. Another factor that Planning Officials considered was population size, taking account of the <i>'Review of the Statistical Classification and Delineation of Settlements'</i> report (NISRA, 2015).</p> <p>These considerations were coupled with Settlement Appraisals, which assessed each settlement for additional factors, such as land uses, services and facilities, as well as a strategic analysis of the landscape character.</p> <p>The Council considers that the above approach delivered robust criteria against which hamlets were evaluated.</p>
<p>Areas such as Creavery have been considered (it may be presumed) due to the proximity of a school. This is in the absence of a clearly defined 'cluster'. In contrast other areas such as Springvale, including commercial and residential development in a clearly definable cluster, which would traditionally have been</p>	<p>In order to be identified as a 'new' hamlet (one that was not previously identified in an area plan), the Council requires a location to possess an existing cluster of dwellings with a sense of place and a character that is distinct from the surrounding rural area, as well as one or</p>

<p>recognised as a hamlet do not 'fit' within the definitions in the POP.</p> <p>Consideration should be given to widen the hamlet criteria to include areas such as Springvale, junction north of Doagh, Houston's Corner, and Loughanmore (Rathmore Road).</p>	<p>more community facilities to benefit the surrounding population.</p> <p>On assessing Creavery, the Council acknowledged a distinct cluster of dwellings on the Creavery Road, which includes Creavery Terrace. Planning Officers identified a number of community facilities and services, including Creavery Gospel Hall and associated car parking, a joinery business, and a trotting stadium. The settlement development limit will be defined at Local Policies Plan stage, when it will also be considered whether Creavery Primary School could comprise a secondary node to the hamlet.</p> <p>The Council assessed Springvale, the junction north of Doagh, Houston's Corner, and considered these locations did not fulfil the hamlet criteria. However, at Local Policies Plan stage there may be potential to include Loughanmore Road as a node associated with the hamlet of Rathmore.</p>
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Villages

- 6.4 The POP Preferred Option proposed villages to be placed on the fifth-tier of the POP six-tier Settlement Hierarchy, above hamlets, and beneath towns. The POP proposed to designate Dunadry as a village due to its size, role and function. The POP also proposed to designate the residential neighbourhood of Mallusk as a village, although its limit would sit contiguous to the settlement limit of the larger Metropolitan Newtownabbey area. The main comments received during the POP public consultation in respect of villages are as follows:

Villages	
Main Comments	Consideration
Villages need to be carefully controlled and monitored.	In line with current regional policy, the Council recognises that the Borough's villages perform an important role in maintaining and enhancing the rural way of life by providing homes, services and facilities to meet the local needs of

	<p>residents and the surrounding rural hinterland.</p> <p>In order to protect this role and function, the Council has included planning policy within the Plan Strategy that will manage and promote positive sustainable development where appropriate. This may include small-scale residential development, which focuses on existing commitments and infill opportunities.</p> <p>The Local Policies Plan will detail development limits and further designations.</p>
<p>Dunadry should not be classified as a village, but should instead be identified as a hamlet as per legacy area plan.</p> <p>There was support for Aldergrove, Toome and Muckamore to be classified as villages.</p> <p>Some respondents supported the designation of Mallusk as an individual village due to its urban character. However, there was also disagreement with the designation of Mallusk as a village as there would be an unclear defined settlement limit and it is seen as an integral part of Metropolitan Newtownabbey. If it should be designated as an individual village then Glengormley, Carnmoney, Jordanstown and Whiteabbey should be similarly designated.</p>	<p>Planning Officers updated the evidence base by conducting a Strategic Settlement Analysis at each location in order to identify the role and function of each potential village. This information helped the Council formulate the Plan Strategy Settlement Hierarchy.</p> <p>The Council considered the role and function of Dunadry was consistent with that of a small village and as such, it has been included within the village tier in the Plan Strategy. It is apparent that the settlement's population and level of services are considerably more than that of a hamlet. At Local Policies Plan stage, Planning Officers may consider the village designation as having two nodes in order to ensure compact form.</p> <p>The Council considers that Aldergrove fulfils the role and function consistent with a hamlet, exhibiting a distinct sense of place that is different to the surrounding rural area, along with the provision of community services. As such, the settlement has been identified as a village in the Plan Strategy.</p> <p>Following the Council's Strategic Settlement Analysis, it is considered that the role and function of Toome remains consistent with that of a Level 1 village on the RDS Hierarchy of Settlements and Related Infrastructure Wheel. It has</p>

	<p>subsequently been included as a village in the Plan Strategy.</p> <p>The Council acknowledges that there is a significant grouping of buildings within the area known as Muckamore; however, there are no community facilities. Consequently, it is considered to fall short of both hamlet and village designations, and has therefore not been identified as a settlement within the Plan Strategy.</p> <p>The Council included Mallusk in its Strategic Settlement Appraisal to analyse its role and function. Over the passage of time, the location has become part of the fabric of Metropolitan Newtownabbey. It is not considered good planning practice to have separate settlements adjoining and abutting each other. The Plan Strategy therefore includes this location within the Settlement Development Limit of Metropolitan Newtownabbey.</p> <p>It is noted that similar requests were received during the POP public consultation for former villages within Metropolitan Newtownabbey to be identified as separate settlements, such as Glengormley and Carnmoney. These have also been regarded as being contrary to good planning practice. Historically, Newtownabbey originated through the merging of seven historic villages, creating one encompassing metropolitan area.</p>
<p>There was a call for a proposed new garden village on greenfield site within the countryside at Ballymartin / Ballyhartfield.</p>	<p>The Council considered that the concept of a new village went against the Plan Strategy's Settlement Hierarchy and Strategic Settlement Analysis. It was concluded that the proposed new village would be unsustainable and not in accordance with current regional policy.</p> <p>The concept of a new village is contrary to the RDS, which does not direct population growth to new settlements, but rather directs sustainable growth to existing hubs, which in turn can offer a range of existing services and infrastructure provision.</p>

	<p>The SPPS sets a sequential approach to the identification of suitable sites for settlements of over 5,000 population. Working through this approach, the Council's evidence base suggests that growth should be allocated to larger settlements, limited growth to smaller areas, with there being no requirement for a new unestablished village.</p> <p>The Council also considered that locating a new settlement in such close proximity to an existing settlement would prove detrimental and cause unnecessary urban sprawl into the rural area. It is under one mile from the existing village of Templepatrick, and while it appears to benefit from being adjacent to a major transportation interchange, there is no apparent historical sense of place or focal point, nor community facility or service provision. Existing buildings are sporadic throughout the surrounding countryside and are associated with active farms.</p>
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Towns

- 6.5 The POP Preferred Option proposed that large towns would be on the third-tier, and towns would sit below this on the fourth-tier of the Borough's Settlement Hierarchy. It proposed that Ballyclare be distinguished as a large town, due to it providing a substantial range of services and being identified as serving a large rural hinterland. In the POP, it was also proposed that Crumlin and Randalstown maintain their town status, considering the good range of services they each provide, along with their respective population base. The main comments received during the POP public consultation that relate to towns, are as follows:

Towns	
Main Comments	Consideration
Ballyclare should not be classified as a 'large town', as this will exacerbate current ongoing issues associated with traffic congestion.	Following this representation, Planning Officers updated the evidence base, in line with Departmental guidance by conducting a Strategic Settlement Analysis for the town to examine its role and function. It was concluded that the town performs a greater function than that of

	<p>the Boroughs other towns, Crumlin and Randalstown.</p> <p>Ballyclare is home to a greater variety of facilities and services, employment sites, schools and leisure facilities. Additionally, Ballyclare has a larger population, with roughly double that of Crumlin and Randalstown. Ballyclare is well located in terms of transportation and acts as a service centre for the wider rural hinterland.</p> <p>The Council acknowledges that Ballyclare town centre is a meeting place of several roads, and this can result in traffic congestion. An important element of the strategic development of the town will be the completion of the Ballyclare Relief Road. The Council has, and will continue to work with the Department for Infrastructure regarding transportation improvements for Ballyclare.</p>
<p>Crumlin and Randalstown should be considered equal to Ballyclare and designated as 'large towns'. They have been disadvantaged and held back with a dated Plan, it is wrong to demote them below Ballyclare, which has benefitted from a more recent Plan.</p>	<p>In the Strategic Settlement Analysis, Planning Officers fully examined the role and function of each town. As mentioned above, it was confirmed that Ballyclare offers a wider range of services and plays a greater role to its rural hinterland. As a result, the Council considers it was appropriate to place Ballyclare in a different tier than Crumlin and Randalstown. Consequently, Ballyclare is a 'large town', and Crumlin and Randalstown are consistent with the 'town' tier of the Plan Strategy Settlement Hierarchy.</p>
<p>The POP exercise of re-classifying existing settlements should extend to all settlements. For example, Templepatrick and Doagh should be elevated into the town category, considering their relative sizes in comparison to other villages, their strategic locations and roles that they serve, and the illustrated levels of growth that they are to accommodate.</p>	<p>The Strategic Settlement Analysis demonstrates how Planning Officers configured robust criteria for each tier within the Plan Strategy Settlement Hierarchy. Using this criteria, the role and function of each settlement was examined, which determined the respective placement within the hierarchy.</p> <p>Analysis illustrated that the role and function of Templepatrick and Doagh was consistent with that of a village. While they</p>

<p>Consideration should be given to the inclusion of an additional tier, re-introducing the Local Town status.</p>	<p>are recognisably larger than the majority of villages in the Borough, the Council considers they do not fulfil the role and function of a town. Their respective range of infrastructure does not go beyond Level 1 of the RDS Hierarchy of Settlements and Related Infrastructure Wheel. In addition, it bears some weight that their population of 1,437 for Templepatrick and 1,390 for Doagh (2011 Census), falls within that recommended of a village (1,000 – 2,499 persons) in the Settlement Band Classification (NISRA, 2015).</p> <p>The Council considered that the suggestion of adding a further tier, 'Local Towns', to accommodate these larger villages would result in an overly complex Settlement Hierarchy.</p>
<p>Allow Mallusk (<i>Mallusk Road</i>) to be considered as a linear town with the shops, retail units as the main street frontage.</p>	<p>The Council welcomed this suggestion and recognition of the cluster of retail and service provision on the Mallusk Road. Planning Officers noted that this location is within Metropolitan Newtownabbey and would not be appropriate with the historical ethos of Newtownabbey to include a smaller individual town within the larger established metropolitan area.</p> <p>In relation to the retail and service provision at this location, the Council has recognised the role it provides and has considered this is in line with a local centre and not a town centre, within the Plan Strategy Hierarchy of Centres. Further information on this can be found within the Classification of Centres section of this POP Public Consultation Report.</p>
<p>Support for the Preferred Option of Antrim to be designated as a Major Town/Main Hub.</p>	<p>In the Strategic Settlement Appraisal, Planning Officers examined the role and function of Antrim. It recognised the settlement's extensive range of services and facilities, which supports its local population and those residing in the surrounding towns, villages and hamlets. Services and facilities include, but are not limited to, employment, education, health, retail, leisure, community, hospitality, and</p>

	<p>tourism. Antrim has a town centre, which contains a Conservation Area. A further consideration is the 23,353 (2011 Census) population of Antrim, which is more than double that of Ballyclare, but around a third of Metropolitan Newtownabbey.</p> <p>The analysis demonstrated that Antrim plays a greater role and function than the large town of Ballyclare, and as such the Council considers it appropriate to be placed in a tier higher than Ballyclare, but lower than the larger urban area of Metropolitan Newtownabbey. The Council has considered that it is appropriate to describe Antrim as a Major Hub Town, reflecting both its status in the Regional Development Strategy and its position as a town.</p>
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RAF Aldergrove

- 6.6 The Ministry of Defence (MoD) site at RAF Aldergrove is located on land situated south of Belfast International Airport. At the time the POP was published, the Council stated that the site continued to operate as a military base, but also contained land and buildings that may in the future become surplus to MoD requirements. However, the MoD has since advised the Council that the site is now occupied by the Joint Helicopter Command Flying Station and will be retained for operational purposes, with plans to demolish the existing housing stock. There is therefore no potential brownfield redevelopment opportunity that could be integrated into the Council's Local Development Plan (LDP). The following comments were received during the POP public consultation:

RAF Aldergrove
Main Comments
RAF Aldergrove would be an attractive location for housing (including social housing), a bespoke business park, technology hub, or sporting facility. It could be classified as a new village.
The existing green infrastructure within the RAF Aldergrove site should be retained and enhanced.
RAF Aldergrove should be included as a windfall site to accommodate expansion of Belfast International Airport.

Classification of Centres

- 6.7 In planning terms, the Borough's 'centres' are those shopping and local commercial areas that play an important socio-economic role within the Borough.
- 6.8 The Strategic Planning Policy Statement (SPPS) indicated that a LDP should define a Hierarchy of Centres. Similar to the Settlement Hierarchy, this is the process of classifying the Borough's centres according to their role and function. This will inform decisions about where new commercial growth and development should take place. In the POP, the Council asked if there was agreement with the proposed classification for the Borough's centres, and main comments received during the POP public consultation are as follows:

Classification of Centres	
Main Comments	Consideration
With regard to the POP list of suggested centres, the Council should be satisfied that there is sufficient evidence of capacity to accommodate new centres and that the evidence includes investigation of impact of any new proposal upon existing centres.	<p>The POP stated that an initial review indicated the potential to develop new centres (POP p.54). The Council commissioned a Retail and Commercial Leisure Study to examine these locations and the potential to impact upon the health of existing higher-order centres, and the realism of attracting the aspired level of development. Using the results, the Study made a number of recommendations, including that Mossley West should be initially being identified in the LDP as a local centre as opposed to a district centre, as was suggested in the POP. This position can be reviewed as the location may have potential to become a district centre.</p> <p>In line with Departmental guidance, the Study updated the evidence. The Council subsequently took account of, and applied its recommendations to the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies. Further information is in Evidence Paper 4: Retail and Commercial Leisure, which supplements the Plan Strategy.</p>
Consideration that a three-tiered (Tier 1 town centre, Tier 2 district centre, and Tier	The Council agrees with the SPPS approach in order to secure a town centre first approach to retailing and other main town centre uses. To examine how these

<p>3 local centre) approach would be sound and consistent with the SPPS.</p> <p>The use of neighbourhood centres is confusing and these should be classified as local centres.</p>	<p>tiers can be applied to the Borough, the Council commissioned a Retail and Commercial Leisure Study.</p> <p>With the robust evidence updated, the Study concluded the Council's four-tier hierarchy was in line with the SPPS and appropriate to the Borough. However, further to this, the Study recommended using more precise titles to avoid confusion. The Council agreed with these recommendations and applied them to the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies. Background information on these decisions is included within Evidence Paper 4: Retail and Commercial Leisure, which supplements the Plan Strategy.</p> <p>The Study also recommended that the neighbourhood centres identified at POP stage should be classified as local centres, which the Council has carried forward in its LDP Retail Hierarchy.</p>
<p>Additional smaller scale retail facilities can still be considered on the basis of need, as per SPPS para. 6.278.</p>	<p>The Council recognises there will be a need for small-scale retail facilities. The Plan Strategy has identified local centres within main settlements, and a number of the larger villages. These local centres play an important role in serving the everyday needs of residents in the area, and as such help promote sustainable development due to reducing the need to travel to other settlements.</p> <p>Where proposals are outside of the Plan Strategy Hierarchy of Centres, the Council will permit retail uses where they are consistent with planning policy as set out in Strategic Policy 2: Employment, and related Detailed Policies.</p>
<p>Support for preferred option. The role of centres (including large town and town centres) should be expanded/broadened, and include the promotion of cultural and community facilities, retail, leisure, and businesses.</p>	<p>The Council welcomes this support for the POP Preferred Option. Planning Officers have further clarified the role and function of each tier within the Plan Strategy, based on recommendations from the Retail and Commercial Leisure Study (Evidence Paper 4).</p>

	<p>The Council is supportive of the broad range of town centre uses, as set out in the SPPS Regional Strategic Objectives (SPPS, pp. 101-102). Subsequently, the Council has provided planning policy within the Plan Strategy that directs town centre uses primarily to the centres identified in the Hierarchy of Centres in order to ensure their vitality and viability are protected. This sequential approach is in line with the SPPS.</p>
<p>Welcome the proposed classifications for Hierarchy of Centres. Four-tier nature is noted - suggested that addition of quantitative criteria to differentiate between Tier 1 (large town / district centre) and Tier 2 (town / district centre) may be of benefit.</p>	<p>Subsequent to the POP, the Council updated the evidence base in line with Departmental guidance by commissioning a Retail and Commercial Leisure Study, through which, the proposed four-tier hierarchy was evaluated. It was determined to be a sound approach that incorporated current regional policy provisions and reflected the Borough's position.</p> <p>The Study applies a series of quantitative measures to the role and function of each tier, for instance, differentiating Tier 1 as serving 'a significant hinterland', whilst Tier 2 is described as serving 'a hinterland'.</p> <p>The Study continues by examining a series of indicators to measure a centre's role and function within its hinterland. These indicators include population within a ten-minute drive time, number of retail units offered, the market share of comparison goods, the availability of community facilities, and the presence of a supermarket. From this analysis, it is clear to see the different characteristics between Tier 1 and Tier 2 centres.</p> <p>The Council considered this robust evidence and has included the reflection of the Borough's centres in the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies, with background information available in the supplementary Evidence Paper 4: Retail and Commercial Leisure.</p>
<p>Proposals for designating or expanding centres should be appropriate to their role</p>	<p>Following the POP, and as mentioned above, the Council updated the evidence</p>

<p>and function within the hierarchy and supportive of town centre first approach.</p>	<p>base in line with Departmental guidance by commissioning a Retail and Commercial Leisure Study (Evidence Paper 4). This confirmed the sound rationale behind the Council's approach to its Hierarchy of Centres.</p> <p>The Study has informed the Plan Strategy of the scope and purpose of each of the Borough's centres. The centres have been placed within the Hierarchy of Centres according to the findings. This is supported by planning policy provided in Plan Strategy Strategic Policy 2: Employment and related Detailed Policies, which advocates a town centre first approach, in line with current regional policy. This policy clarifies what is appropriate for each tier, along with proposals for town centre uses that fall outside a centre location.</p> <p>The boundaries of the Borough's centres, along with any proposed expansion, will be detailed at Local Policies Plan stage.</p>
<p>Request for the removal of shopping centres in the classification as this appears to grant them status equivalent to a traditional town centre, which they are not.</p>	<p>Without clarification on what this representation infers as 'shopping centres' within the POP Hierarchy of Centres, the Council assumes reference is being made to the Abbey Centre.</p> <p>The Council recognises that Metropolitan Newtownabbey is unique in that the settlement lacks a traditional town centre. However, it is home to the Abbey Centre and the retail facilities immediately surrounding the mall, which has the largest retail floorspace and market share within the Borough, serving a very wide catchment. The Council's commissioned Retail and Commercial Leisure Study (Evidence Paper 4), which considered the role and function of the wider Abbey Centre area, outlined these facts.</p> <p>The Council considers the findings of the Study to be sound and offers an accurate reflection of the unusual scope and purpose of the wider Abbey Centre area. As such, it remains as a Tier 1 centre within the Hierarchy of Centres, and for greater</p>

	clarification, is now described as a large town centre.
There was a call for centre boundaries to be defined to ensure surrounding centres and uses are not compromised.	<p>The Council's Retail and Commercial Leisure Study (Evidence Paper 4) established an understanding of the scope and purpose of each centre and their respective place within the Hierarchy of Centres. Subsequent to this, Planning Officers have reflected the Study's recommendations into the Plan Strategy, specifically Strategic Policy 2: Employment, and related Detailed Policies. Having a robust Hierarchy of Centres will direct development to the most appropriate location, ensuring each tier's viability is supported and encouraged.</p> <p>The boundaries of the Borough's centres will be defined at Local Policies Plan stage.</p>
There were calls for existing town centre boundaries to be retained as they are currently.	<p>The Council acknowledges the merit in defining centre boundaries, which enable the application of sequential, impact and needs tests when considering proposals for development.</p> <p>The Retail and Commercial Leisure Study identifies the Borough's various centres and examines their boundaries as detailed in legacy area plans. The Study has identified that some town centre boundaries will remain the same and some will change. These are preliminary boundaries that will be reviewed at the Local Policies Plan stage. Further information is set out in Evidence Paper 4: Retail and Commercial Leisure.</p>
Endorse the classification of a Hierarchy of Centres based on their size and function. However, the glossary of terms of the withdrawn PPS 5: Retailing and Town Centres still provides the most acceptable and logical tool for defining and interpreting centres.	<p>Whilst compiling the Classification of Centres, the Council has taken account of current regional policy, strategies, and guidance including the SPPS.</p> <p>PPS 5: Retailing and Town Centres was cancelled by the introduction of the SPPS and is therefore not a consideration. Whilst the PPS 5 glossary was prescriptive on retailing provisions of town, district and local centres, the SPPS remains relatively silent and permits Councils flexibility in</p>

	<p>determining criteria for each tier, appropriate to each unique area. The Council has used this approach to design a Classification of Centres that is appropriate to the Borough. It will be a key component of the impact and sequential tests in decision making for town centre uses.</p> <p>Following the recommendations emerging from the Council's Retail and Commercial Leisure Study, Planning Officers have simplified the names of each tier from that which was proposed in the POP. Further detail can be found within the Study (Evidence Paper 4), which supplements the Plan Strategy.</p>
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Hierarchy of Centres

- 6.9 The SPPS indicates that LDPs should define a network and 'Hierarchy of Centres' for their area – town, district and local centres, acknowledging the role and function of rural centres. LDPs should also set out appropriate policies that make clear which uses will be permitted in the Hierarchy of Centres and other locations.
- 6.10 The formulation of the Plan Strategy provides an opportunity to reassess the existing Hierarchy of Centres and potentially adjust the classifications that currently apply. The Council has the ability to define the scope and purpose of each of the Borough's centres, and set local policy and proposals accordingly.
- 6.11 The Council considers that a simple 'town, district and local' hierarchy would not accurately reflect the relative role and function of the Borough's various commercial centres. The Council has therefore proposed that the LDP should contain a revised hierarchy, which better reflects both the existing relative importance and the future development potential of the Borough's centres.
- 6.12 The POP Preferred Option proposed a new four-tier classification that retains the Borough's current centres. The Council asked if there was agreement with the Preferred Option and the main comments received during the POP public consultation are outlined below:

Hierarchy of Centres	
Main Comments	Consideration
Some respondents believed Glengormley was considered as an area that is not traditionally a town or district centre and	The Council welcomed the various POP representations on the position of

<p>therefore should not be designated as a district centre.</p> <p>In contrast, the district centre designation was endorsed and suggestions made that it should include Portland Avenue and extend down Carnmoney Road and Antrim Road.</p>	<p>Glengormley within the Hierarchy of Centres.</p> <p>Following the POP the Council updated the evidence base in line with Departmental guidance and commissioned a Retail and Commercial Leisure Study (Evidence Paper 4), which fully examined the role and function of the Borough's centres, including Glengormley and considered where each centre should be appropriately placed within the hierarchy.</p> <p>The Study found that Glengormley serves a wide hinterland, and whilst the centre does not have a major foodstore, it actually has more retail units than any other centre in the Borough. The Study recommends that Glengormley's success as the centre with the lowest vacancy rate in the Borough should be supported and encouraged.</p> <p>In conclusion, the Study established that Glengormley's role and function is comparable to that of a town centre and should therefore be elevated from its legacy area plan status of a local centre to a town centre. The Council agrees with this recommendation and this has subsequently been reflected in the Plan Strategy.</p> <p>The boundary of this designation will be determined at Local Policies Plan stage.</p>
<p>There was a request for Mossley West to be designated as a town centre instead of a proposed district centre.</p>	<p>The POP proposed a new district centre at Mossley West, which generated debate among stakeholders during the POP public consultation. The Council subsequently ensured it was examined further within the Retail and Commercial Leisure Study (Evidence Paper 4).</p> <p>The Study agreed that the concept of a new centre at this location was sound, as it would serve nearby civic, leisure, commercial and residential population, where there is currently no significant provision. The Council agreed with the Study's recommendation that the centre should initially be defined as a local centre,</p>

	<p>as this is the most fitting description of its likely preliminary components (shops and services) at least in the near future. This will be revisited at the next LDP review, by which time it might be appropriate to consider the centre as a Tier 3 district centre.</p>
<p>There is a strong argument for a retail core within Ballyclare.</p>	<p>The Council's Retail and Commercial Leisure Study examined the practice of designating retail cores and was mindful of the relatively small size of centres within the Borough, compared to others nearby. It considered that retail cores could unduly constrain the availability of potentially beneficial and generating footfall sites.</p> <p>However, the Study recommends town centre boundaries would maintain and encourage vitality and viability. The Council considers this appropriate, and has included planning policy to this effect within the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies. Boundaries will be determined at Local Policies Plan stage.</p>
<p>Separating Northcott centre from Glengormley could potentially draw more retail and other uses away from Glengormley. It may be more appropriate to designate Northcott as a local centre with Glengormley as a district centre.</p>	<p>Following these comments, the Retail and Commercial Leisure Study (Evidence Paper 4) examined this concern. With their differing roles and functions, the Study recommended these centres be two distinct and separate designations. The Council considered this to be a sound approach and subsequently included the locations as individual centres within the Plan Strategy.</p> <p>Further to this, the Study concluded that due to their respective roles and functions, Glengormley should be designated as a town centre, with Northcott as a district centre. The Council considered that in light of the evidence, this was a sound recommendation and subsequently this has been reflected in the Plan Strategy.</p> <p>Boundaries will be defined at Local Policies Plan stage.</p>

<p>There was agreement that the Abbey Centre should occupy the top tier and should be sequentially preferable for future retailing and commercial uses within the Metropolitan area.</p> <p>A further opinion was that the Abbey Centre performs as a town centre and should therefore be afforded similar opportunity to grow and to include cultural and community facilities, leisure, entertainment and business, along with retail.</p> <p>There was a request that any additional floor space at the Abbey Centre district centre (Tier 1) should be carefully assessed to ensure no detrimental impact on Belfast City Centre or other retail centres in the city.</p>	<p>The Council's Retail and Commercial Leisure Study (Evidence Paper 4) has examined the unique role and function of the Abbey Centre mall and its immediate hinterland, and subsequently recommended that it be considered as a Large Town. This will be reflected in the Plan Strategy.</p> <p>While compiling evidence for the Retail and Commercial Leisure Study, the consultants worked with neighbouring Councils, and surveyed residents on fringe areas to understand inflows and outflows. The Study assessed the impact of the Borough's centres on neighbouring centres, and noted that the Borough has relatively small sized centres by comparison.</p> <p>The Study further acknowledges that the role and function of the Abbey Centre mall and its immediate hinterland should be subservient to Belfast City Centre, as per current regional policy, and the application of a town centre boundary would aid this. In terms of future growth, the Study advised that the Council should use its planning powers to seek to bring forward a wider range of community facilities to further enhance the town centre. The Council considers this recommendation to be sound, this being reflected in the Plan Strategy, with a town centre boundary being identified at Local Policies Plan stage.</p>
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Town and District Centres

- 6.13 The POP Preferred Option for the Borough's centres recognised the Abbey Centre mall and its immediate hinterland as a major commercial centre. It further recognised that the area contains much development and some redevelopment opportunities. It suggested that these could be managed to enhance the centre's role as the primary commercial and service centre within Metropolitan Newtownabbey, which also serves a wider hinterland extending across much of the Borough and into neighbouring Council areas. It was therefore proposed in the POP that it be reclassified as a 'large district centre'.

- 6.14 Antrim town centre provides a broad range of shops and facilities that serve a large hinterland that includes the neighbouring local towns. The POP therefore recommended that it be designated as a 'large town centre', to reflect its current size and significant future development potential.
- 6.15 Whilst the centres of Glengormley and Northcott are located relatively close to one another and together provide a wide range of shops and services, the POP Preferred Option was to maintain them as distinct and separate centres. The Council considered that a potential merger could lead to a proliferation of retail and other uses away from the heart of Glengormley and thereby detract from its vitality.
- 6.16 The POP Preferred Option also recognised the performance and local function of Ballyclare, Crumlin and Randalstown, classifying them in the hierarchy as town centres and proposing a review of their respective town centre boundaries.
- 6.17 The POP considered designating Mossley West as a new district centre due to its significant development potential and strategic location. The Council asked if there was agreement with this Preferred Option, and if further district centres could be identified. Main comments received during the POP public consultation are as follows:

Town and District Centres	
Main Comments	Consideration
The term 'district centre' should be removed as it is a throwback to 1960s planning and is outdated in the context of the new planning system.	The term 'district centre' is used within current regional policy and is a recommendation of the Council's commissioned Retail and Commercial Leisure Study (Evidence Paper 4). The Council considers it to be both a sound and a consistent approach to use the term within the Plan Strategy and supporting documents.
Suggestion that more emphasis could be applied to advocating the use of vacant and underused listed and non-listed buildings in encouraging town centre growth.	<p>The Council endorses this sustainable approach to development, which can be applied not only to the centres. This has been reflected in Strategic Policy 7: Historic Environment, and related Detailed Policies, which clarify that the Council extends this beyond listed buildings, to locally important buildings.</p> <p>The Council will support proposals for the sympathetic renovation or conversion of locally important buildings that will maintain these buildings in active use.</p>

<p>Greater clarity is required with regards to the role and function of the proposed district centre at Mossley West.</p> <p>There was a call for Mossley West designation to be named 'Ballyearl', and that it should be recognised as a community/civic hub rather than a district centre, which suggests a dominant retail use.</p> <p>Another response considered it already had an established agricultural use.</p> <p>There were further concerns of potential detriment to salmonid stocks in the adjacent Six Mile Water river.</p>	<p>Subsequent to these comments, the Retail and Commercial Leisure Study (Evidence Paper 4) examined the proposed district centre at Mossley West in greater detail.</p> <p>The Study agreed that the concept of a new centre at this location would be sound, as it would serve nearby civic, leisure, commercial and residential population, where there is currently no significant provision. The Council agreed with the Study's recommendation that the centre should initially be defined as a local centre, as this is the most fitting description of its likely preliminary components (shops and services), at least in the near future.</p> <p>The Council considers the name Mossley West appropriate as it is locally recognised and reflects the adjacent rail and bus halt, which is also known as 'Mossley West'. Whilst land in the vicinity to the identified centre is historically agricultural, a large proportion of the land was zoned in legacy area plans as employment lands and future development is anticipated through the designation of a Strategic Employment Location.</p> <p>Planning policy presented in the Plan Strategy will ensure high quality new development both integrates, respects and enhances the Borough's natural environment, including the biodiversity within river corridors.</p>
<p>Agree that the Abbey Centre is a higher order district centre. It performs the role of town centre for Metropolitan Newtownabbey.</p>	<p>Subsequent to the POP, the Council's Retail and Commercial Leisure Study examined the role and function of the Abbey Centre relative to the Borough's other centres.</p> <p>The Council recognises that Metropolitan Newtownabbey is unique in that the settlement lacks a traditional town centre. However, it is home to the Abbey Centre and the retail facilities immediately surrounding the mall, which have the largest retail floorspace and market share within the Borough, serving a very wide catchment. These facts were outlined in</p>

	<p>the Retail and Commercial Leisure Study (Evidence Paper 4), which the Council considers to be sound and offers an accurate reflection of the unusual scope and purpose of the wider Abbey Centre area. As such, it remains as a Tier 1 centre within the Plan Strategy Hierarchy of Centres, and for greater clarification, it is now described as a large town centre.</p>
<p>There were comments that there was no justification for the growth of the Abbey Centre or surrounding area, while there was also a call for pockets of whiteland surrounding the Abbey Centre to be included within its boundary.</p> <p>Some respondents supported existing district centre boundaries to be retained as they are, while others noted that boundaries have changed over recent years and should be amended to reflect this.</p> <p>Extensions to district centre boundaries should be done in the context of a retail impact assessment and a sequential test.</p>	<p>The Retail and Commercial Leisure Study (Evidence Paper 4) examines the Borough's various centres boundaries as detailed in legacy area plans. When compared to on the ground observations, there was agreement that the boundaries of the existing (i.e. existing in legacy area plans) district centres (Abbey Centre and Northcott) were accurate and should be taken forward.</p> <p>Following the adoption of the Plan Strategy and its designated centres, Planning Officers will further evaluate each location to determine their specific boundary. These boundaries will be consistent with the policy approach set out in the Plan Strategy. Where appropriate, primary retail frontages will be detailed.</p> <p>The Council acknowledges the merit in defining centre boundaries, which enable the application of sequential, impact and needs tests when considering proposals for development.</p> <p>Planning policy for centres is included in Strategic Policy 2: Employment, and related Detailed Policies, with boundaries being detailed at Local Policies Plan stage.</p>
<p>We asked if any other areas should be identified as new district centres. Some respondents considered there was no need for additional locations until vacancy rates in existing district centres had reduced.</p>	<p>The Council took these comments into consideration and subsequent to the POP, Planning Officers updated the evidence base in line with Departmental guidance by conducting a thorough survey of the Borough of lower order centres. This survey was incorporated into the Retail and Commercial Leisure Study (Evidence Paper 4), which provided robust evidence to recommend that Whiteabbey Village is</p>

	<p>consistent with the district centre tier. The Council considered this appropriate and this is reflected in the Plan Strategy Hierarchy of Centres.</p>
<p>Northcott district centre is endorsed, and should be extended to include the petrol filling station.</p>	<p>The Council welcomes this endorsement for Northcott's designation as a district centre. The Retail and Commercial Leisure Study (Evidence Paper 4) examined the role and function of this centre and considered it consistent with a district centre. As such, it has been included in this tier of the Plan Strategy Hierarchy of Centres.</p> <p>Further to this, the Retail and Commercial Leisure Study also examined Northcott's boundary as detailed in the legacy area plan. This legacy boundary extends to include the petrol filling station. When compared to on the ground observations, there was agreement that the boundary was accurate and should be brought forward.</p> <p>Following the adoption of the Plan Strategy, Planning Officers will evaluate each centre further to determine their respective boundaries. These boundaries will be consistent with the policy approach set out in the Plan Strategy.</p>
<p>The boundary of Glengormley should be extended to the southwest to include the range of business units at the Movie House Cinema located off the Glenwell Road.</p>	<p>The Retail and Commercial Leisure Study (Evidence Paper 4) examined the centre of Glengormley and where the centre boundary might be defined compared to that designated in the legacy area plan.</p> <p>The Study considered the centre has evolved exponentially since the last time the centre was defined, and as such, it should be extended to the west and east. It further recognised small pockets of well-established centre to the north, along Carnmoney Road and Portland Avenue, which should also be brought into the centre boundary.</p> <p>The Council will consider these suggestions within the Local Policies Plan stage, when</p>

	the specific boundaries of the Borough's centres will be defined.
Antrim's town core should be retained and ensure current retail provision on Castle Way and Fountain Street is included in the primary retail core boundary.	<p>The Council recognises the merit of measures such as town centre cores in enabling the application of sequential, impact and needs tests when considering proposals for development. As such, the Plan Strategy includes policy for town centre boundaries, which will be defined in the Local Policies Plan.</p> <p>The Retail and Commercial Leisure Study (Evidence Paper 4) examined Antrim town core, as detailed in the legacy Antrim Area Plan. Whilst this was found to be largely accurate, a number of amendments to the boundary were recommended, including the inclusion of Tesco store on Castle Way. The Study also recommended no primary retail cores in the Borough.</p> <p>The Council will consider these suggestions within the Local Policies Plan stage, when the specific boundaries of the Borough's centres will be defined.</p>
There was support for a town centre boundary for Crumlin, and suggestions that it should be extended to include the leisure centre and as far as the railway. Another suggested it should extend from Tesco and along the Main Street. Others believed it would be impossible to define a smaller more central area within this linear format. There is no smaller or more central area under threat from non-retail uses and as such a primary retail core is unnecessary.	<p>The Retail and Commercial Leisure Study (Evidence Paper 4) examined Crumlin's town centre boundary as designated in the legacy Antrim Area Plan. It recommended a number of amendments to the boundary, such as the inclusion of the leisure centre and the entire Tesco store, and the exclusion of two residential areas.</p> <p>The Council will consider these suggestions within the Local Policies Plan stage, when the specific boundary of the Borough's centres will be defined.</p>
<p>Some respondents considered that the town centres of Ballyclare, Crumlin and Randalstown should not have primary retail cores as these may discourage investment and development. It was considered that these centres were not fit for 21st century transport needs.</p> <p>There was support for a primary retail core in Ballyclare, and suggestions that it should</p>	<p>The Council considers the merits of accurate town centre boundaries, along with the application of appropriate planning policy, will prove valuable in sustaining and enhancing the vitality and viability of the Borough's town centres.</p> <p>The Retail and Commercial Leisure Study (Evidence Paper 4) examined each of the Borough's town centres, the legacy</p>

<p>be extended to Asda, to the schools, and to Lidl.</p> <p>There was support for a primary retail core in Randalstown, however it was suggested that it should be restricted to Main Street and New Street.</p>	<p>boundaries, and what was currently on the ground. From this analysis, it concluded that Ballyclare and Randalstown were accurate and should be brought forward, but Crumlin's legacy boundary required some amendments.</p> <p>The Study also recommended no primary retail cores in the Borough.</p> <p>Planning Officers will examine these locations further at Local Policies Plan stage to determine their specific boundary.</p>
<p>Is there a way to control the type of shops in town centres? There are too many charity shops and 'pound shops'.</p> <p>Promote local people to open small shops and boutiques.</p>	<p>In relation to town centres, current regional policy clarifies that it is the role of a LDP to promote town centres first for retail and other main town centre uses. The marketing and ownership of businesses is outside the remit of a LDP.</p>
<p>There was a call for town centres to be redeveloped as residential and social spaces.</p>	<p>The Council supports the Regional Strategic Objective (SPPS, para. 6.271) to protect and enhance diversity in the range of town centre uses appropriate to their role and function, such as leisure, cultural and community facilities, housing and businesses. This is reflected in the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies.</p>
<p>Allow Mallusk to be considered as a linear town with the shops, retail units as the main street frontage</p>	<p>The Council welcomes this suggestion and recognition of the cluster of retail and service provision on the Mallusk Road.</p> <p>Following the Planning Officer's Strategic Settlement Appraisal, it was considered that this location within the wider Mallusk employment lands location was indeed within the Metropolitan Newtownabbey area and it would not be good planning practice to include an individual town within the settlement of Metropolitan Newtownabbey.</p> <p>In relation to the retail and service provision at this location, the Council has recognised the role it provides and has considered this is in line with a local centre and not a town</p>

	centre, within the Plan Strategy Hierarchy of Centres.
We asked if there were any town centre opportunity sites that are available for development. We received a number of suggested sites in Antrim and some in Ballyclare.	The Council welcomes these suggestions and will consider them further at Local Policies Plan stage, when opportunity sites may be designated to encourage further vitality and viability in the Borough's town centres.

Local and Village Centres

- 6.18 The POP Preferred Option also recognised the importance of local/village centres, and presented an opportunity to identify new locations. A further Preferred Option was to consider a local centre at Mallusk Road, recognising the range of existing shops and facilities clustered in the centre of the wider Mallusk industrial and commercial area.
- 6.19 The Council also asked if there were any particular villages that would be suitable to have a defined village centre, as initial evidence suggested several locations may benefit from such a designation. Main comments received during the POP public consultation are as follows:

Local and Village Centres	
Main Comments	Consideration
Support for village centres as a means to protect their viability, however some respondents considered the designation unsustainable.	<p>In line with Departmental guidance, the Council updated its evidence base by preparing a Settlement Hierarchy and Analysis, which examines the role and function of villages. The findings were used to inform the Council's commissioned Retail and Commercial Leisure Study. This Study recommended that the POP tier 'local centre/village centre' be reclassified as 'local centre', as used in current regional policy.</p> <p>The Council considers this recommendation appropriate and has renamed the tier as local centres in the Plan Strategy Hierarchy of Centres, defining them as 'rural' local centres where they are designated in villages.</p>

	<p>The boundary of local centres will be determined at Local Policies Plan stage.</p>
<p>All villages should be granted local centre status.</p>	<p>Using the updated evidence gathered during the Settlement Hierarchy Analysis, the Retail and Commercial Leisure Study (Evidence Paper 4) examined the role and function of each of the Borough's village centres. It concluded five had similar characteristics to local centres - Ballynure, Doagh, Parkgate, Templepatrick and Toome. This was based upon their size, layout, catchment, services and community uses. These five villages were identified as important local centres serving wider rural communities and sustaining the rural area.</p> <p>The Council considered it a sound approach to include these rural local centres within the Plan Strategy Hierarchy of Centres.</p> <p>The boundary of these centres will be determined at Local Policies Plan stage.</p>
<p>Request for local centre classification to be renamed 'high street' as they are akin to a neighbourhood high street.</p>	<p>The Council welcomed this suggestion, however, it considers the term 'local centre' to be appropriate as it is used within current regional policy and is a recommendation of the Council's commissioned Retail and Commercial Leisure Study (Evidence Paper 4). The Council considers it to be both a sound and a consistent approach to use the term within the Plan Strategy and supporting documents.</p>
<p>It was suggested that Aldergrove should be designated as a local centre, which has the potential to include an integrated transport hub.</p> <p>Other suggestions for local centres were Nutts Corner, Templepatrick, and Cloughfern Corner.</p>	<p>The Council has considered these suggestions and assessed the role and function of each location. The Retail and Commercial Leisure Study (Evidence Paper 4) recommended that a local centre should provide a range of shops and services to a surrounding community. The Council has subsequently included Templepatrick and Cloughfern as local centres.</p> <p>While Belfast International Airport and Nutts Corner do not fulfil the role and function of</p>

	<p>local centres, the Council recognises their existing role as significant employment hubs. As such, the Plan Strategy has designated them as rural Strategic Employment Locations. Further detail on this and local centres can be found within the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies.</p>
<p>Merville Garden Village and Whiteabbey Village are misplaced in the neighbourhood centre classification and would be best suited under the village classification with a defined village centre.</p> <p>Dunadry would also benefit from a village centre.</p>	<p>Based on updated evidence gathered during the Settlement Hierarchy Analysis, the Retail and Commercial Leisure Study (Evidence Paper 4) examined the role and function of each of the Borough's centres. This analysis demonstrated that Merville Garden Village is consistent with a local centre, and the larger Whiteabbey Village consistent with a district centre. The limits of these centres will be defined at Local Policies Plan stage.</p> <p>When Planning Officers examined the role and function of Dunadry, it was concluded that the settlement did not currently have the range of shops and services expected of a local centre.</p>
<p>Mossley West should be classified as a local centre keeping it under a five-year review.</p>	<p>It was a Preferred Option of the POP to designate a new district centre at Mossley West. This was analysed further in the Retail and Commercial Leisure Study (Evidence Paper 4), which agreed that the concept of a new centre at this location would be sound, as it would serve nearby civic, leisure, commercial and residential population, where there is currently no significant provision.</p> <p>The Council agreed with the Study's recommendation that the centre should initially be defined as a local centre, as this is the most fitting description of its likely preliminary components (shops and services) at least in the near future. This will be revisited at the next LDP review, by which time it might be appropriate to consider the centre as a Tier 3 district centre.</p>

<p>Support was given to the local centre at Mallusk Road, due to the existing retailing, facilities, and number of employees and residents in the immediate area. However, there was a concern that drainage and sewage infrastructure needed attention.</p> <p>Doagh does have an active village centre but it has a lack of supporting parking provision.</p>	<p>Following analysis of the updated evidence, the Retail and Commercial Leisure Study (Evidence Paper 4) determined that the role and function of facilities clustered at Mallusk Road and those in Doagh to be consistent with that of local centres. Subsequently, the Council has included them as such within the Plan Strategy Hierarchy of Centres.</p> <p>The Council will continue to work with key partners in addressing wastewater and surface water infrastructure, enabling any planned improvements within the LDP. In terms of parking provision, development proposals will be assessed in line with requirements set in policy, depending on the scale and nature of the proposal.</p>
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Neighbourhood Centres

- 6.20 The POP Preferred Option included a tier below its local/village centres called neighbourhood centres. In this tier, the POP retained three existing neighbourhood centres that were identified in the legacy Antrim Area Plan, namely Greystone, Parkhall, and Ballycraigy.
- 6.21 Neighbourhood centres can provide an important function in the Borough's large urban areas. They provide a local facility for people in terms of shopping and other uses. The POP acknowledged that by retaining and identifying neighbourhood centres in the new LDP, these facilities are likely to be protected from other forms of development, thereby retaining and enhancing such local facilities. This will also help sustain local communities.
- 6.22 A further POP Preferred Option also allowed for the identification of 'new' neighbourhood centres that were areas of development that were not designated in legacy area plans. No neighbourhood centres were identified in BMAP for Metropolitan Newtownabbey, and initial evidence suggested that there are several places that may benefit from such a designation. The POP public consultation received a number of suggested locations. Main comments received relating to neighbourhood centres during the POP public consultation are as follows:

Neighbourhood Centres

Main Comments	Consideration
<p>The tier relating to new neighbourhood centres is confusing and lacks clarity in its meaning. Policy should clearly set a threshold, and where premises have been vacant for a long time, there should be scope within policy to be redeveloped for alternative uses.</p>	<p>Following on from the POP, the Council updated the evidence base in line with Departmental guidance by commissioning a Retail and Commercial Leisure Study (Evidence Paper 4), which examined the role and function of the Borough's centres, and proposed a Hierarchy of Centres. The Study recommended the hierarchy be simplified and the POP classification 'neighbourhood centre' be amalgamated with the 'local centre' classification, as used in current regional policy.</p> <p>The Council considered this to be a sound and consistent approach and as such, these classifications have been adopted in the Plan Strategy, and clarified in the Strategic Policy 2: Employment, and related Detailed Policies.</p>
<p>While there was support for the POP Preferred Option to retain existing neighbourhood centres whilst identifying new ones, there was also a call for no new designations as the Borough had reached capacity.</p>	<p>Based on updated evidence gathered during the Settlement Hierarchy Analysis, the Retail and Commercial Leisure Study (Evidence Paper 4) examined the role and function of each of the Borough's centres.</p> <p>This Study confirmed the placement of the POP neighbourhood centres (now termed local centres), including the identification of a number of 'new' centres that acknowledged existing development and were not previously identified in legacy area plans. These new centres are simply recognising existing clusters of shops and services and therefore no negative retail impact on neighbouring centres is anticipated. The boundaries of these centres will be further examined and designated within the Local Policies Plan. Any proposed extension or rounding off will be fully assessed to ensure there is no negative retail impact.</p>
<p>There was support for the preferred option and suggestions for new neighbourhood</p>	<p>The Council welcomed these suggestions for neighbourhood centres, which as discussed above have been termed local centres within the Plan Strategy.</p>

centres at Jordanstown, Mallusk Road and Springfarm. Ballycraigy is no longer functioning as a neighbourhood centre – Islandbawn stores should be a substitution for Ballycraigy.	<p>Planning Officers examined these suggested locations and concluded that there was sufficient retail and service provision at Monkstown, Jennings Park and Whiteabbey Village to serve the Jordanstown area, and that a new centre is not required.</p> <p>The updated evidence base showed that the role and function of retail and service provision at Mallusk Road is consistent with a local centre, and as such has been brought forward in the Plan Strategy.</p> <p>Planning Officers examined Springfarm, which did not demonstrate the retail and service provision of a centre, and as such, has not been included in the Plan Strategy at this time.</p> <p>It was confirmed that Ballycraigy is indeed no longer functioning as a centre; however, it was found that Islandbawn does not fulfil the range of functions to be considered as a centre, and has therefore not been included in the Plan Strategy.</p>
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Out of Centre Shopping Areas

- 6.23 The POP outlined the existing out of centre shopping areas at The Junction Retail Outlet and Leisure Park, and outside the BMAP (2014) boundary of the Abbey Centre district centre, at Valley Retail Park, Shore Road Retail Park, and at Mill Road, Newtownabbey. The POP explained the Council's approach in that, given their location beyond the Hierarchy of Centres, development proposals at these locations will be assessed on their merits against prevailing planning policy.
- 6.24 The POP asked stakeholders if there was agreement with the approach to out of centre shopping areas. During the POP public consultation, the Council received the following main comments:

Out of Centre Shopping Areas	
Main Comments	Consideration
Supportive of discouraging edge of town and out of town retail parks and major shopping centres in favour of fostering the growth of local, sustainable town centres.	The Council updated the evidence base in line with Departmental guidance by commissioning a Retail and Commercial Leisure Study (Evidence Paper 4) to

<p>There was a call for out-of-town development to be stopped immediately, that focus should be on town and village centres.</p>	<p>examine the provision and capacity of retailing within the Borough.</p> <p>In line with current regional planning policy, the Study recommended the application of a Hierarchy of Centres and a town centre first approach in order to protect and enhance the vitality and viability of Borough's centres.</p> <p>The Council considers this approach to be sound and has reflected it within the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies. These policies also detail how proposed development of town centre uses outside of the Hierarchy of Centres are required to demonstrate that a sequential test has been applied.</p>
<p>Flexibility should be applied in the consideration of all sequentially preferable sites.</p>	<p>The Council considers the application of a sequential test for proposed town centre uses that are located outside of identified centres, to be a sound and appropriate approach for the Borough. In applying this measure, the Council enables the protection and enhancement of the Borough's vitality and viability of centres.</p> <p>The Council recognises there may be instances where a degree of flexibility should be applied to certain proposals and in these instances, the sequential test may not be required. Acceptable instances are detailed in the Plan Strategy Detailed Policies.</p>
<p>Consideration should be given to changing circumstances of town centres.</p>	<p>The Council recognises that the retail market is particularly changeable. It is considered that planning policy within the Plan Strategy contains sufficient flexibility to meet emerging retailing trends and market demands.</p> <p>In line with legislation, and current regional planning policy, the Council will adopt a programme of monitoring to review the LDP, determining if the Plan's Strategic Objectives are being achieved and whether any changes are required. It may be appropriate within these reviews to amend policy in order for the LDP to</p>

	continue to protect and enhance the vitality and viability of the Borough's changing town centres.
The mix of acceptable uses in town centres should be broadened (i.e. education, residential, commercial leisure, etc.). Town centres should be redeveloped as residential and social spaces.	<p>Current regional planning policy clarifies that the range of town centre uses that may be appropriate can include the development of retail, leisure (including evening/night-time economy uses), office, visitor accommodation, and appropriate housing and community facilities. The Council will support appropriate residential proposals above shops and other businesses as these contribute to the safety, viability and vitality of the Borough's centres.</p> <p>The Council considers the inclusion of such a range of uses within the Borough's centres will protect and encourage vitality and viability. This direction has been reflected within Plan Strategy 2 Employment and related Detailed Policies.</p>
There should be disaggregation of large mixed-use schemes. These are often deliberately contrived to be too large to fit in existing centres in order to establish their future position as an out of centre location.	<p>The application of Plan Strategy Strategic Policy 2: Employment will ensure out of centre proposals are appropriately assessed and where applicable, have been justified through the application of the sequential test and a robust retail assessment.</p> <p>Further to this, the Council's placemaking policies within the Plan Strategy will support schemes that offer good design and retain local distinctiveness and character within the Borough.</p>

General Retail

- 6.25 As well as defining and identifying a Hierarchy of Centres and bringing forward new planning policy, the LDP will be required to define the spatial extent of the Borough's centres. The centres should provide for a diverse retail offer and mix of uses, which reflect local circumstances as part of the LDP preparation process.
- 6.26 The POP welcomed stakeholder's views and comments, and presented a number of questions to stimulate debate. General retail comments received during the POP public consultation include the following:

General Retail	
Main Comments	Consideration
There were calls for adequate car parking to be provided at centres.	The Council recognises that car parking provides accessibility for many people and, in line with current regional planning policy, this has been reflected in the Plan Strategy in Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies. Development proposals will be determined in line with requirements set in these policies, depending on the scale and nature of the proposal.
The need for the LDP to accommodate cross boundary retail.	<p>The Council acknowledges there is a degree of retail leakage to surrounding areas. In line with Test of Soundness CE1, (to ensure cross boundary issues are not in conflict with development plan documents of neighbouring Councils), this matter was examined by the Retail and Commercial Leisure Study (Evidence Paper 4), which included analysis to gain an understanding of the Borough's market share. It was concluded that the Borough's current retention rate is healthy, and leakage was highest in Randalstown, where some residents travelled to Ballymena for their convenience spend.</p> <p>The Study's recommendation that a constant market share approach is maintained in the Borough, and future growth does not raise conflict, has been adopted in the Plan Strategy.</p>
Suggestion that there should be consideration given to twilight and night time economy.	The Council recognises the importance of vibrant town centres, and although providing an evening economy is largely outside the remit of a Local Development Plan, the Council can, where appropriate, enable sustainable centre uses that could operate during these hours, such as leisure, cultural and community facilities, and housing. This approach is in line with current regional policy and is reflected in the Plan Strategy.

Strategic Employment Locations

- 6.27 Another key component of the LDP's Spatial Growth Strategy is where and how it should facilitate future employment growth. Employment and economic growth is a key priority for the Council. The Council's Corporate Plan describes the Borough as a place where residents prefer to live and work, and where businesses choose to locate and grow.
- 6.28 To facilitate future employment growth, the Council's LDP must ensure that a ready and generous supply of economic land for strategic business use and industry is maintained. As part of this process, it is considered that there would be merit in identifying those larger strategically located sites in the Borough that should be protected for employment purposes and where as a consequence future proposals for alternative uses would be resisted. It is considered that these sites should be generally 10 hectares or greater, and have been defined in the Plan Strategy as Strategic Employment Locations (SELs). These sites should be protected for employment purposes and consequently, proposals for alternative uses should be resisted.
- 6.29 The POP Preferred Option was to identify existing SELs in Metropolitan Newtownabbey, Antrim and Ballyclare. It was also to consider designating undeveloped 'new' SELs in Antrim, Ballyclare, Crumlin, and Randalstown.
- 6.30 The POP also proposed two rural SELs, at Belfast International Airport (BIA) and Nutts Corner. Main comments made during the POP public consultation that relate to SELs included:

Strategic Employment Locations	
Main Comments	Consideration
A clear definition of SELs is required as currently these are seen as not contributing to Sustainable Development. The recommendation that acceptable uses within the zoned SELs be included within the LDP, together with a Development Limit for each to provide certainty for investors.	<p>Subsequent to the POP, the Council updated its evidence base in line with Departmental guidance by commissioning an Employment Land Evaluation Report (ELER), which has been included as Appendix 1 of Evidence Paper 3: Economic Growth. This examined the POP definition of SELs as areas over 10 hectares, and confirmed that SELs could be described as 'around' 10 hectares or more, that are capable of accommodating significant employment opportunities and economic activity when considered in the context of the Borough.</p> <p>Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies describe appropriate uses within</p>

	SEs. Further detail will be provided in the Local Policies Plan, along with limits to each designation.
When defining SEs, consideration should be given to the potential range of employment sectors, the ability to develop and support key business sectors, the layout and the quality of design and environment created.	<p>In line with current regional policy, the Council considers that the Plan Strategy provides an adequate range and quality supply of land to facilitate economic growth. The Plan Strategy also provides policies that welcome a wide range of employment opportunities on employment sites.</p> <p>The Council recognises that good design and positive placemaking is a key component in the delivery of high quality sustainable places in which people want to work. As such, the Plan Strategy includes Strategic Policy 6: Placemaking and Good Design, and associated Detailed Policies.</p>
Consideration should be given to the transport infrastructure (all modes) as a key assessment factor. SEs should be accessible to all and not just private car users.	<p>The Council is committed to encouraging sustainable connectivity throughout the Borough. This has been reflected in the Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies.</p> <p>The majority of SEs are areas of existing development, and cannot simply be relocated to what may be perceived as a more sustainable location. However, the Council will continue to work with key partners to promote more sustainable connections to these locations, along with any improvements identified in transport plans.</p> <p>In terms of the placement of the new, undeveloped SEs in Antrim and Ballyclare, Planning Officers will apply a scoring matrix, such as that proposed in Appendix C of the Council's ELER, which is within Appendix 1 of Evidence Paper 3: Economic Growth. This includes a series of tests that examine the proximity to main traffic routes and public transport. This is in line with the SPPS, which calls for improved integration between transport,</p>

	economic development and other land uses.
A Land Evaluation Framework should be applied to existing employment sites before any new sites are brought forward.	<p>Following the POP, the Council updated its evidence base in line with Departmental guidance, by commissioning the ELER. The ELER has been included as Appendix 1 of Evidence Paper 3: Economic Growth. This provided Planning Officers with an assessment of the Borough's existing employment land provision, remaining capacity, and how the future needs for new and additional employment land can be delivered in a sustainable manner.</p> <p>The Plan Strategy took account of the ELER in Strategic Policy 2: Employment, and related Detailed Policies.</p>
Suggestion for further SEL tier across the Borough – 'Local Rural Enterprise/ Employment Zones.	<p>The Plan Strategy proposes a two-tier approach to the provision of employment land, with the identification of SELs and Local Employment Sites. The two rural SELs identify the local and regional significance of Belfast International Airport (BIA) and Nutts Corner. The Council recognises existing employment opportunities at these locations, along with their position on the strategic transport network, as recognised in the Regional Development Strategy (RDS).</p> <p>Within the countryside, the Council will support a range of employment opportunities through planning policy, where the nature and scale of development respects the rural character. The Plan Strategy provides policy that recognises the need to support micro or small-scale employment proposals in the rural area.</p>
The Preferred Option for proposed SELs in Antrim, Ballyclare, Crumlin and Randalstown may be at odds with the RDS approach, however suggest that alternative	The Council considers that the approach of the SEL Preferred Option (POP, p.68) is in accordance with the RDS, particularly RG 1: Ensuring adequate supply of land to facilitate sustainable economic

<p>terminology could be applied to safeguard existing employment land.</p>	<p>growth. In line with this current regional policy approach, the Plan Strategy ensures focus is on the Borough's larger urban centres and BIA, as a Regional Gateway. The Council also considers the Plan Strategy to be in line with RDS SFG policies, in that the Borough's employment land will not detract from other key locations in the Belfast Metropolitan Urban Area.</p> <p>On updating its evidence base in line with Departmental guidance, the Council commissioned an ELER, which can be read at Appendix 1 of Evidence Paper 3: Economic Growth. The ELER examined existing employment land, and where appropriate these lands will be identified and protected within the LDP. The Council considers that the terms 'Strategic Employment Locations' and 'Local Employment Sites' are sound and appropriate for the Borough.</p> <p>The ELER also concluded that SELs were not required at Crumlin and Randalstown. The Council considers this position to be sound. SELs will not be designated in these settlements in the interests of flexibility, the Council will support employment proposals where they are appropriate to the surrounding location and in line with prevailing planning policy.</p>
<p>Further collaboration is required with neighbouring Councils with regards to economic development opportunities across the Belfast Metropolitan Urban Area (BMUA) in accordance with the RDS.</p>	<p>The Council has held, and will continue to be involved in, cross boundary collaborations with neighbouring Councils throughout the development of the LDP. This is in line with soundness test CE1.</p>
<p>A number of representations requested lands to be considered for employment related uses - including inside settlements and outside settlements.</p>	<p>In order to ascertain the location of existing employment lands and identify SELs in the Plan Strategy, Planning Officers considered the principle of these site-specific representations. In updating the evidence base, as required by Departmental guidance, Planning Officers were required to assess the</p>

Borough's portfolio of employment land, its remaining capacity, and predicted future demand. Therefore, as part of the preparation of the Plan Strategy, the Council examined a range of employment sites.

The ELER, which is available to read at Appendix 1 of Evidence Paper 3 – Economic Growth, identified a need for SELs in the top three settlements in the Borough, i.e. Metropolitan Newtownabbey, Antrim and Ballyclare. Where a site-specific representation came forward that met the SEL criteria in these three settlements, it has been brought forward in the Plan Strategy document.

The ELER identified no need for SELs in lower tier settlements, i.e. Crumlin and Randalstown, therefore site-specific representations for these settlements have not been considered. A number of other site-specific representations came forward for smaller employment lands within settlements, and these will be considered at Local Policies Plan stage.

Further to this, a number of site-specific representations came forward outside of settlements. The Council is only proposing to bring forward rural SELs at BIA and Nutts Corner. This is due to a number of prevailing reasons, including:

- BIA and Nutts Corner are unique in terms of their strategic location on the RDS Regional Strategic Transport Network and BIA as a Regional Gateway;
- Their extensive existing employment land contribution; and
- Urban areas are the primary location for sustainable employment land provision due to their resident employee bases and existing infrastructure network provision.

	<p>Site-specific representations relating to BIA and Nutts Corner will be considered further at the Local Policies Plan stage when the Council will define the boundary of SELs. A range of other site-specific representations were received but they have not been taken forward as SELs as they do not relate to BIA or Nutts Corner, do not meet the 10 Ha criteria, and are not strategically located on the Regional Strategic Transport Network which the Council wants to exploit, in line with the RDS.</p> <p>The Council recognises the contribution that existing rural employment lands bring to the Borough's economy and prosperity of rural communities. As such, the Council welcomes and will support businesses in the countryside where they are appropriate to their surrounding location and are consistent with prevailing planning policy.</p> <p>Further information on the consideration of existing and new employment land within the Borough's settlements and countryside is within Strategic Policy 2: Employment, related Detailed Policies, and Evidence Paper 3: Economic Growth, which supplements the Plan Strategy.</p>
A sequential approach should be applied, with zonings primarily located within settlement limits, close to centres.	The majority of SELs focus on existing developed employment locations and cannot simply be relocated in order to apply a sequential approach. However, the Council recognises the benefit of applying a sequential approach when selecting new, undeveloped employment designations at Local Policies Plan stage. This will be applied along with scoring proposed new sites against a matrix as previously detailed.
It is important to provide a choice and variety of sites across the Borough to respond to the changing nature and requirements of business and industry.	The Council recognises this position. In line with Departmental guidance, it updated its evidence base, and commissioned an ELER, which can be read at Appendix 1 of Evidence Paper 3: Economic Growth.

	<p>The ELER examined the Borough's portfolio of sites, in terms of location, quality and availability. The ELER's recommendations have been included in the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies. Planning Officers will conduct annual monitoring of employment land to ensure the LDP Strategic Objectives are being achieved and if any changes to the LDP are required. This will ensure the LDP is sufficiently flexible to meet emerging market trends and business demands.</p>
<p>The introduction of Simplified Planning Zones in certain areas, such as SELs, could be particularly attractive to investors.</p>	<p>The Council has considered this mechanism to facilitate economic growth, however is not proposing Simplified Planning Zones at this stage. This position will remain under review.</p>
<p>Industrial zones could be knitted into the actual town using backland, brownfield and gap site reuse.</p>	<p>The majority of the employment sites identified in the Plan Strategy are already in existence; however, the ELER (Evidence Paper 3: Economic Growth, Appendix 1) has identified the need for two further SELs during the LDP period, 2015 to 2030 – one each in Antrim and Ballyclare. The ELER also examined brownfield sites within these settlements and scored them against a matrix to assess their suitability. This exercise will be updated at Local Policies Plan stage when suitable sites will be identified.</p>
<p>A number of these locations contain historic environment assets.</p>	<p>It is one of the Strategic Objectives within the Plan Strategy to ensure that high quality new development integrates with, respects and enhances the Borough's historic environment. This is reflected in the Plan Strategy's Strategic Policy 7: Historic Environment, and related Detailed Policies.</p>
<p>Smaller existing sites and older sites may now be more suited for alternative uses.</p>	<p>In preparing the Plan Strategy, the Council commissioned an ELER, which can be read at Appendix 1 of Evidence Paper 3: Economic Growth. This included an initial assessment on the suitability of</p>

	<p>the Borough's existing employment land portfolio and brownfield sites. This included sites of all sizes, and those presented in legacy area plans.</p> <p>When identifying employment sites in the Local Policies Plan, Planning Officers will undertake a further appraisal of the Borough's employment land portfolio to update planning histories and ensure sites have not been subject to approval or development of alternative uses. A matrix similar to that at Appendix C of the ELER will be applied. Those sites that are deemed appropriate and sustainable will be brought forward in the Local Policies Plan.</p>
Main Belfast International Airport Employment Comments	Consideration
Expression of general support for the designation of an SEL at this location.	The Council welcomed support for an SEL at this strategic Regional Gateway location. The Council considers the continued recognition of this existing employment hub to be appropriate and in line with current regional policy. The SEL has been brought forward into the Plan Strategy and is supported by Strategic Policy 2: Employment, and related Detailed Management Policies. Limits to the designation will be defined in the Local Policies Plan.
There is little emphasis on Belfast International Airport's (BIA) connectivity, particularly if there is any potential for improving public transport linkages, disused railways, etc.	<p>The Council acknowledges BIA's role as a Regional Gateway, as identified in the RDS, and will encourage the facilitation of sustainable development of key connections to the location.</p> <p>In the Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies, the POP Objective is expanded to encourage better connectivity. These policies demonstrate how accessibility, connectivity, sustainability, and ease of movement can be enabled within the Borough, including links to and from BIA. The Council will continue to liaise with key</p>

	<p>stakeholders, including the Department for Infrastructure, to enable enhanced connectivity to BIA. The Council supports the Department for Infrastructure's plans to upgrade roads that link BIA to the wider area.</p>
<p>May have impact on Major Employment Location in West Lisburn and could undermine efforts to revitalise Antrim town.</p>	<p>The Council will continue to prepare its LDP taking into account cross boundary matters and any potential incompatibility issues as set out in the tests of soundness. The Council notes that, having surplus of employment land, Lisburn and Castlereagh City Council is considering re-designating the Major Employment zoning in West Lisburn to a mixed-use development that would see up to fifty percent of the site being de-zoned and reallocated as housing land. No evidence has been presented in POP representations to demonstrate the impact of further employment at BIA as having an impact on West Lisburn or Antrim town centre.</p> <p>At Local Policies Plan stage, the introduction of Key Site Requirements and limited uses at the Belfast International Airport SEL, along with periodic monitoring, can ensure the Borough's economic designations can co-exist and support one another.</p>
<p>A sound evidence base is required to support this designation.</p>	<p>The rationale behind BIA SEL is to acknowledge existing employment lands and the site's role as a Regional Gateway, as identified in the RDS, which includes current regional policy that aims to strengthen the regional competitiveness of gateways.</p> <p>The Plan Strategy has been based on a robust and sound evidence base, including the ELER, which examined the Borough's portfolio of employment land, including this unique site. The ELER can be read at Appendix 1 of Evidence Paper 3: Economic Growth. The Local Policies Plan will detail the boundary of the SEL and acceptable uses.</p>

<p>The creation of SELs should be examined within the context of furthering sustainable development and operating environmental limits.</p>	<p>The Plan Strategy's Strategic Objectives and planning policies have been underpinned by the principles of sustainable development and subject to a Sustainability Appraisal. This assessment accompanies the Plan Strategy. Similarly, the Local Policies Plan, which will identify each zoning, will be subject to a further Sustainability Appraisal.</p>
<p>An SEL at BIA would have significant impacts on the A6 priority route, Templepatrick.</p>	<p>The Council supports the Department for Infrastructure's plans to upgrade roads related to BIA and Templepatrick and will continue to lobby that these schemes are prioritised and funded. The Council will continue to liaise with the Department for Infrastructure and ensure any forthcoming plans can be enabled through the LDP and consider that further growth of BIA cannot be halted due to Government funding priorities.</p> <p>The Plan Strategy will also encourage a transition towards more sustainable modes of transport and will balance the needs of road users and the local community, as well as seeking ways to improve public transport links and walking/cycling opportunities where feasible.</p>
<p>If agreement was made with Ministry of Defence – the industrial and commercial sites could form part of the BIA SEL.</p>	<p>The Ministry of Defence (MoD) has advised the Council that their lands located adjacent to BIA are now occupied by the Joint Helicopter Command Flying Station and will be retained for operational purposes. There is therefore no potential brownfield redevelopment opportunity that could be integrated into the Council's LDP.</p>
<p>Policy should be introduced to prevent off-site airport related car parking. This should only be permitted within the designated Airport Operational Area.</p>	<p>The Plan Strategy supports the provision of car parking at BIA where this would meet an identified local need and in line with current operational planning policy. Further information can be found in Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies.</p>

Main Countryside Employment Comments	Consideration
<p>There was strong support for an SEL at Nutts Corner, including representations from a number of local landowners. SEL designation at Nutts Corner is necessary to allow for the orderly growth of this area as an economic development base.</p>	<p>The Council welcomed the strong support for an SEL at this strategic location. The Council considers the continued recognition of this existing rural employment hub to be appropriate and in line with current regional policy. The SEL has been brought forward into the Plan Strategy and is supported by Strategic Policy 2: Employment, and related Detailed Policies. The limits of the designation will be detailed in the Local Policies Plan.</p>
<p>A rural SEL at Nutts Corner will enhance the variety and choice of potential investment locations and may particularly appeal to those businesses seeking or requiring a more rural location or wishing to take advantage of its good physical connectivity.</p>	<p>In line with current regional policy, it is a Strategic Objective of the Plan Strategy to provide a range of quality land to facilitate business growth and to promote economic diversification. The rationale behind the Nutts Corner SEL is to recognise existing economic development at this long-established employment base.</p>
<p>Nutts Corner is not served by sustainable transport and would generate car journeys.</p>	<p>Nutts Corner is strategically located on the Regional Strategic Transport Network Corridor, as identified by the RDS. It connects to regional gateways and surrounding settlements. It is a Strategic Objective of the Plan Strategy to enable sustainable development, and this includes encouraging the use of sustainable transport.</p> <p>The Council commissioned a Strategic Transport Assessment (included as Appendix 5 in Evidence Paper 10: Transportation) in order to assess current traffic issues and any implications that may occur. The Assessment concluded that should the SEL designation simply identify existing development, traffic would not be generated beyond that already accounted for. The Assessment further predicted that should 5 to 10 hectares of growth be permitted at the SEL during the LDP period, 2015 to 2030,</p>

	<p>the impact of traffic generated would be below the threshold that would call for mitigation measures. In order to make these journeys more sustainable, the Council welcomes enhanced public transport to this location, and will provide policy within the LDP to encourage this service provision.</p> <p>It is anticipated that any additional growth at Nutts Corner will be generally focused on the storage and distribution sector, which does not generate substantial private car journeys and that the Council will liaise with key stakeholders to improve public transport links as well as encouraging cycling/walking opportunities where feasible.</p>
Nutts Corner should have a development limit in order to provide certainty for prospective developers – drawn having regard to existing and permitted commercial uses.	<p>This is in line with the approach outlined in the POP Preferred Option. This option was evaluated in the Council's commissioned ELER, which can be read at Appendix 1 of Evidence Paper 3: Economic Growth. The ELER concluded the extensive employment growth in existence must be recognised. Subsequently, the Plan Strategy has included a SEL at Nutts Corner, the boundary of which will be defined at Local Policies Plan stage.</p>
The LDP should not be overly prescriptive about the range of uses that may be permitted at areas of economic development in the countryside. Provision should be made for Class B uses and sui generis employment uses.	<p>The Plan Strategy is based on principles of sustainable development. As such, it provides policy that aims to ensure development in the countryside will support rural communities and the rural economy, whilst at the same time focusing the location of major schemes in the Borough's settlements, thus protecting the countryside from unsuitable uses in terms of amenity or environmental impact.</p> <p>The Local Policies Plan will define the boundary of the SEL, along with acceptable uses that may be permitted within sites, where appropriate. There is a need to ensure appropriate uses are located here to maximise this unique</p>

	location, to protect the viability of employment land within the settlements, and to further sustainable development.
Nutts Corner SEL would be unlikely to impact on the regional economic role of Belfast City, although may have impact on Major Employment Location in West Lisburn.	<p>The Council will continue to prepare its LDP taking into account cross boundary matters and the issue of conflict as set out in the tests of soundness (CE1). The Council notes that given the surplus of employment land, Lisburn and Castlereagh City Council is considering re-designating the Major Employment zoning in West Lisburn to a mixed-use development that would see up to fifty percent of the site being de-zoned and reallocated as housing land. The Council also notes that neighbouring Councils have not taken the opportunity to object to any previous planning applications at Nutts Corner.</p> <p>At Local Policies Plan stage, the introduction of Key Site Requirements and limited uses at the Nutts Corner SEL, along with periodic monitoring, can ensure the Borough's economic designations can co-exist and support one another.</p>
Consideration should be given to the opportunity to complement future transport improvements such as A26.	The Council has worked, and will continue to work, closely with the Department for Infrastructure to deliver a sustainable transport network that is capable of supporting the LDP Spatial Growth Strategy. The Council supports upgrades to the Borough's transport network and endeavours to ensure the LDP enables this development. This is reflected in the Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies.
Appropriate Key Site Requirements, which seek to identify and preserve key heritage assets at the site (including runways, etc.) and their settings would be important towards achieving sustainable heritage led development at Nutt's Corner.	It is a Strategic Objective of the Plan Strategy to ensure that high quality new development integrates with, respects and enhances the Borough's historic environment. Where appropriate, Key

	Site Requirements will be detailed at Local Policies Plan stage.
A number of representations requested lands outside settlements be considered for employment related uses.	<p>In order to ascertain the location of existing employment lands and identify SELs in the Plan Strategy, Planning Officers considered the principle of these site-specific representations. In updating the evidence base, as required by Departmental guidance, Planning Officers were required to assess the Borough's portfolio of employment land, its remaining capacity, and predicted future demand.</p> <p>These assessments confirmed to Planning Officers the unique characteristics of BIA and Nutts Corner, and their value not only to the Borough, but also to the wider region. These qualities included their strategic location on the RDS Regional Strategic Transport Network, along with BIA's role as a Regional Gateway. In addition, Planning Officers acknowledged the contribution of the extensive existing employment land. The Council considered that these areas required to be formally recognised, to not only promote and enhance the economic benefits of their unique characteristics, but to provide sustainable control to future development and reassurance to investors through the provision of development limits and application of bespoke planning policy for the designations. These will be brought forward in the Local Policies Plan.</p> <p>The Council considers that it would be unsustainable to designate further employment lands within the countryside, as the focus will be within the urban area due to the resident employee base and existing infrastructure network provision.</p> <p>The Council recognises the contribution that existing rural employment lands bring to the Borough's economy and prosperity of rural communities. As such,</p>

the Council welcomes and will support businesses in the countryside where they are appropriate to their surrounding location and are consistent with prevailing planning policy.

Further information on the consideration of existing and new employment land within the Borough's settlements and countryside can be found within Strategic Policy 2: Employment, related Detailed Policies, and Evidence Paper 3: Economic Growth, which supplements the Plan Strategy.

7 Housing Allocation and Distribution – Main Issues Raised

- 7.1 Planning for future housing growth across the Borough is one of the core functions of the Council's new Local Development Plan (LDP). There are two key stages in the process of planning for this growth. The first is to determine the total number of new dwellings that have to be accommodated through the LDP, and the second is to allocate this housing growth to different places in the Borough. This section of the Report considers those comments received during the Preferred Options Paper (POP) public consultation that relate to the options for housing growth and allocation.

Housing Growth

- 7.2 The identification and allocation of housing growth is considered a strategic matter incorporated into the Plan Strategy, with the subsequent identification and zoning of land for residential purposes being part of the Local Policies Plan.
- 7.3 The POP highlighted that it is essential that the anticipated level of housing growth to be accommodated during the LDP period (1 April 2015 to 31 March 2030) is clearly defined. However, it is important to understand and accept that once the level is defined it is neither a target to be met, nor a cap that cannot be exceeded. The estimation of future housing growth is not an exact science and a degree of judgement is considered essential in formulating an appropriate level of housing growth for the years ahead.
- 7.4 At the time, the POP Preferred Option anticipated the LDP would provide for 13,000 dwellings; a housing growth of 9,750 dwellings during the LDP period, and a 5 year land supply of 3,250 dwellings. It did not differ significantly from the Housing Growth Indicator specified in regional guidance, but afforded reasonable flexibility and a potential increase in build rates from those seen over the last 5 years as the housing market has recovered. This calculation figure has been revised in the Plan Strategy, which identifies 9,750 new homes are required within the Borough during the LDP period. This provides a reasonable amount of housing growth.
- 7.5 The Council asked if there was agreement with this approach to housing growth and the following main comments were received during the POP public consultation period:

HOUSING GROWTH	
Main Comments	Consideration
Agreement with the Council's Preferred Option (13,000 dwellings) and that the five year housing land supply should not be used as part of the calculation of need.	In line with Departmental guidance, Planning Officers updated the LDP evidence base. As a result, the housing growth figure has been revised for the LDP period, with the Plan Strategy identifying that at least 9,750 new homes

	<p>are required within the Borough during the LDP period, 2015 to 2030.</p> <p>Further clarification on housing growth allocation during the LDP period can be found in Evidence Paper 6: Housing, which supplements the Plan Strategy.</p>
<p>Suggestion that the Council takes forward the higher growth option of Option 3 (14,960 dwellings) to allow for greater flexibility.</p> <p>Support for a degree of flexibility to be provided in housing growth.</p>	<p>In line with Departmental guidance, Planning Officers updated the LDP evidence base and took into account the POP comment from the Department of Infrastructure that the five year housing supply should not be built into the housing need figure. As a result, the housing growth figure has been revised for the LDP period, with the Plan Strategy identifying that at least 9,750 new homes are required within the Borough during the LDP period, 2015 to 2030.</p> <p>Further clarification on the housing growth allocation during the LDP period can be found in Evidence Paper 6: Housing, which supplements the Plan Strategy</p> <p>The Planning Act (Northern Ireland), 2011, places a duty on the Council to monitor and review the LDP. This is replicated in the SPPS, which calls for a 'plan, monitor, and manage' approach. The Council has adopted this methodology and, in line with current regional planning policy, undertakes an annual urban housing monitor to measure the uptake and remaining supply of housing land within the Borough. Further information on monitoring is included within Plan Strategy Appendix C.</p> <p>This ensures continued flexibility throughout the LDP period, along with a sustainable and managed release of housing land.</p>
<p>Recommendation that the Council should have lower, more reasonable levels (8,020 dwellings) of growth to allow services to</p>	<p>As mentioned, Planning Officers undertook a review of the LDP evidence base. Subsequently the housing growth and housing need figures have been</p>

<p>cope and prevent detriment to the environment, including river systems.</p>	<p>revised from that outlined in the POP Preferred Option. Information on this is published in Evidence Paper 6: Housing, which supplements the Plan Strategy.</p> <p>Housing growth has been allocated to settlements and the rural area within the Borough according to their individual role and function, and remaining capacities, in line with the Settlement Hierarchy. Housing growth has taken into account existing commitments.</p> <p>The overall Spatial Growth Strategy, as set out in the Plan Strategy, distributes higher growth to the higher tier settlements in the Borough, where the majority of existing services and infrastructure are located, in line with the RDS. This is regarded as a sustainable pattern of growth.</p> <p>Further detailed analysis will be conducted ahead of the Local Policies Plan, which will identify any natural heritage constraints, or Key Site Requirements to protect and, where possible, enhance the natural assets of the Borough.</p>
<p>The housing growth figure should seek to support housing that caters for the needs of wheelchair users and people with a disability, by ensuring that a minimum of 5% of all private units within major developments are designed to wheelchair standard.</p>	<p>The Plan Strategy seeks to encourage a diverse choice of housing that will meet the needs of an ageing and changing population. The housing growth figure includes housing of all types of dwellings and their various tenures.</p> <p>Strategic Policy 4: Homes, and related Detailed Policies, seek new housing development to comply with the requirements for 'Lifetime Homes', and wheelchair accessibility.</p>
<p>Consideration should be given to the growth of neighbouring Councils. The Plan Strategy should demonstrate how the housing growth of neighbouring Councils has been taken account of.</p>	<p>The Council recognises that it does not sit in isolation, and it is important to liaise with neighbouring local authorities.</p> <p>The Plan Strategy and its supporting documents, including Evidence Paper 6: Housing, have taken account of the relevant plans, policies, and LDP documents of neighbouring Councils. In</p>

	<p>addition, Planning Officers have, and will continue to participate in various working groups that have been established to discuss cross boundary issues.</p> <p>Further information on cross boundary housing matters is contained within Evidence Paper 6: Housing, which supplements the Plan Strategy.</p>
Any changes to the figures and any local adjustments to the Housing Growth Indicator must be supported by robust evidence and the rationale for such changes must be articulated in the LDP.	<p>In line with Departmental guidance, Planning Officers updated the LDP evidence base. This has subsequently resulted in a revised housing need for the Borough during the LDP period, 2015 to 2030.</p> <p>The Council considers the LDP evidence base as robust, sound, and in line with current regional planning policy. Evidence sources, along with the methodology employed by Planning Officers in relation to housing growth is explained in Evidence Paper 6: Housing, which supplements the Plan Strategy.</p>
The LDP should incorporate a monitoring provision to ensure that a five-year land supply is maintained and monitored.	<p>The Council, in line with planning legislation, will produce a monitoring Report as set out in the Plan Strategy. This will include an annual urban housing monitor to measure the uptake and remaining supply of housing land within the Borough.</p> <p>This will ensure continued supplies of housing land are available during the LDP period, 2015 to 2030. Further information on monitoring is within Plan Strategy Appendix C.</p>
There are inaccuracies within datasets. This will result in an under provision of housing and will impact on the prosperity of the Borough.	<p>Planning Officers have undertaken a review of the LDP evidence base and housing growth figures. This approach is in accordance with Departmental guidance. This review has resulted in revised housing need figures. The Council considers its methodology and resultant figures as robust and reflective of the Borough's requirements during the LDP period, 2015 to 2030. As mentioned,</p>

	this will be monitored and the LDP can be amended should the need for unpredicted additional housing land arise.
There is a need to take account of suppressed building rates in conjunction with future growth.	<p>The Council has considered these factors during the calculation of housing need figures. This figure is considered appropriate to satisfy the Borough's anticipated requirements over the LDP period, 2015 to 2030, although this will be monitored.</p> <p>Background information on this can be found in Evidence Paper 6: Housing, which supplements the Plan Strategy.</p>
Growth may present a potential adverse impact on historic environment, and for existing historic building stock falling into neglect and decay due to abandonment in favour of new properties. Sites with archaeology should have Key Site Requirements attached.	<p>The Council encourages forms of development that will protect the Borough's special historic features, whilst managing change in a positive manner, by supporting proposals that have the potential to enhance the historic environment.</p> <p>The Council recognises the Borough's rich wealth of archaeological remains. The Plan Strategy has included a policy specifically for these sites. Boundaries of these designations, and any Key Site Requirements, will be defined at Local Policies Plan stage.</p>

Housing Growth Allocation

- 7.6 A core element of the Council's LDP is the allocation of housing growth to individual places in the Borough. This is shaped significantly by the Hierarchy of Settlements described in the overall Spatial Growth Strategy and influenced by the factors defined in the regional policy context contained in the Regional Development Strategy (RDS) and Strategic Planning Policy Statement (SPPS).
- 7.7 Each of the POP options for Housing Growth Allocation was based on the Preferred Option for growth across the Borough of 13,000 dwellings, which has been revised in preparation of the Plan Strategy; the figure is now calculated at 9,750 dwellings. The Preferred Option for Housing Growth Allocation proposed to consolidate the growth planned in Metropolitan Newtownabbey, and focus enhanced growth in the towns and selected villages based upon key transport locations.

- 7.8 The Council asked if there was agreement with the Preferred Option and welcomed the following main comments during the POP public consultation:

HOUSING GROWTH ALLOCATION	
Main Comments	Consideration
General agreement with the Council's Preferred Option. Advocates growth being allocated to Randalstown, and Ballynure.	<p>The Council welcomed support for the POP Preferred Option. This figure has been updated to reflect the LDP evidence base, which was revised post-POP in preparation of the Plan Strategy, in accordance with Departmental guidance. As a result, a higher proportion of growth is allocated to the two largest settlements in the Borough, which differs from that allocated in the POP Preferred Option. Lower order settlements therefore have a reduced proportion of growth allocated than that identified in the POP Preferred Option allocation.</p> <p>The level of growth in the countryside is maintained at 750 units. Therefore, whilst growth is allocated to Randalstown and Ballynure, the proportion is now reduced as set out in Strategic Policy 4: Homes and the supporting Evidence Paper 6: Housing, which supplements the Plan Strategy.</p> <p>This is regarded as a sustainable approach to growth taking into account the RDS and the role and function of each individual settlement. The Plan Strategy delivers a housing growth allocation to Randalstown and Ballynure, appropriate to their individual role and function.</p>
The POP lacks an indication of the Council's intentions regarding the facilitation of growth on brownfield sites.	In order to achieve a sustainable housing supply within settlements, the identification of land for housing will be undertaken at Local Policies Plan Stage, through the zoning of housing land and identification of Housing Land Use Policy Areas. Where appropriate, Key Site Requirements may be attached to such sites.

	<p>Whilst it is acknowledged that the majority of such sites will be delivered through existing housing commitments, where an opportunity exists to identify new housing land, this will be undertaken in line with the RDS target to locate 60% of new homes on existing vacant and underutilised land within the urban footprint of settlements over 5000 units.</p> <p>The SPPS identifies that a sequential approach should be applied in circumstances where new housing land is required within settlements to meet its Housing Growth allocation. Previously developed and undeveloped land should be identified first, then extensions to cities and towns, then exceptional major expansion of smaller settlements and lastly the designation of new settlements.</p> <p>Within settlements, housing will be zoned in the most sustainable accessible locations, which support the vitality and viability of centres, whilst not undermining the Boroughs valued character, natural heritage and historic environment.</p>
<p>Appropriate consideration should be given to accessibility by all means of transport particularly in relation to growth areas, along with basic infrastructure, Waste Water Treatment Works, green space, and facilities such as schools and healthcare.</p> <p>Others considered that the local schools, hospitals, health centres & retail are not adequate to cope with continued expansion.</p>	<p>To facilitate sustainable patterns of growth throughout the Borough over the LDP period, 2015 to 2030, the Council will allocate growth, including housing, to the two largest settlements in the Borough whilst lower order settlements will have a proportionate and sustainable level of growth. This is in line with the RDS, where growth should be directed to places where the necessary services and infrastructure are in place.</p> <p>The LDP also contains a range of Strategic Policies and Detailed Policies that seek to ensure that accessibility is a consideration in the planning process that community facilities in the Borough are protected and can be provided for, that town centres continue to thrive and that residents have access to open</p>

	<p>space. These factors will be considered further at the Local Policies Plan Stage.</p> <p>In addition to this approach, the Council continues to work with key consultees, who are responsible for infrastructure provision, along with facilities, such as schools and hospitals. The Council supports plans for future improvements of these services and will work with consultees to enable their provision.</p>
<p>Consideration should be given to providing clarification in relation to the overall growth allocation given that the housing land supply as per the LDP base date is 14,153 dwellings and no de-zoning is proposed.</p>	<p>The Council's Spatial Growth Strategy clarified that housing growth was based on existing committed development allocations.</p> <p>The Plan Strategy sets out a reduced housing growth figure than that set out in the POP. The Plan Strategy takes account of existing housing commitments.</p> <p>Further information on the allocation of housing is set out in Strategic Policy 4: Homes, and in Evidence Paper 6: Housing, which supplements the Plan Strategy.</p>
<p>Concern regarding the level of growth being attributed to hamlets. However, Gortgill was suggested as suitable for growth.</p>	<p>In line with Departmental guidance, Planning Officers updated the LDP evidence base. This resulted in revised housing growth figures to allocate housing throughout the Borough's settlements and countryside. The POP had proposed a growth allocation of 300 units to be shared amongst hamlets, whereas the revised Plan Strategy has reduced this figure to 150 units. This will permit a sustainable level of limited growth, reflective of their limited range of facilities and services within the Borough's settlements. Gortgill has been included as a hamlet within the LDP Settlement Hierarchy, and a settlement development limit will be detailed in the Local Policies Plan.</p>
<p>Calls to ensure that Housing Growth Allocation aligns with the Spatial Growth Strategy with the aim of focusing core growth</p>	<p>The Plan Strategy Spatial Growth Strategy presents the Borough's Settlement Hierarchy. This recognises the</p>

on the Metropolitan Newtownabbey Area and the Main Hub of Antrim.	wider role and function of Metropolitan Newtownabbey and Antrim, thereby positioning them in the top two tiers of the Settlement Hierarchy. This approach is in line with the RDS and SPPS. The Plan Strategy Settlement Hierarchy guides where sustainable growth should be focused in the Borough during the LDP period, 2015 to 2030. Thereby, main growth will be focused in these top tier settlements.
Options for allocation of housing growth focus primarily on the small towns and villages – note that the RDS identifies that there has been a disproportionate level of growth in smaller settlements and SFG 12 responds accordingly. The Preferred Option fails to give weight to reinforcing the role of Hubs and Clusters noted within Regional Policy.	<p>The Plan Strategy outlines in Strategic Policy 4: Homes, and related Detailed Policies, that allocation of housing growth is based on the role and function of each settlement, its position in the Settlement Hierarchy, as well as building upon existing commitments. Nearly 80% of housing growth during the LDP period, 2015 to 2030, will be allocated to the top three settlements, namely Metropolitan Newtownabbey, Antrim, and Ballyclare.</p> <p>The Plan Strategy approach adheres to the strategic aims of the RDS in consolidating growth in top-level settlements, and sustaining rural towns and villages.</p>
Suggestion that a sequential approach should be applied to identify suitable sites with the use of previously developed land i.e. Brownfield sites and urban capacity studies should be undertaken to inform availability of brownfield land.	<p>The Council has set out its Spatial Growth Strategy for the Borough and has indicated that it builds upon existing housing commitments.</p> <p>The Local Policies Plan will identify and zone the sites that will deliver the overall strategy and a sequential approach will be considered where appropriate. The Plan Strategy also sets out planning policy supporting the use of brownfield land in the planning process.</p> <p>Further detailed analysis will be carried out ahead of the Local Policies Plan, which will designate housing zonings, where appropriate.</p>
Suggestion for higher growth levels in Antrim, Metropolitan Newtownabbey, Randalstown, Templepatrick, Dunadry, Ballynure, Parkgate	The Council welcomed these suggestions. As mentioned, Planning Officers undertook a number of studies

<p>and Local Towns. However, there was disagreement about further growth in Ballyclare, Doagh, Burnside, Mallusk, Templepatrick and Dunadry.</p>	<p>(which are detailed in Evidence Papers 2: Settlement Evaluation, and 6: Housing), in line with Departmental guidance and current regional planning policy. These studies informed the Plan Strategy Settlement Hierarchy, which in turn helped to determine housing growth allocation.</p> <p>The Council has revised the level of housing need to at least 9,750 dwellings and has allocated the majority of growth to the higher tier settlements of Metropolitan Newtownabbey and Antrim. Growth has been allocated to Ballyclare recognising its long term strategic housing commitments. Lower tier settlements have been given lower growth based upon their position in the Settlement Hierarchy. In addition, the Council recognises in its growth strategy that growth takes into account the existing commitments in the Borough.</p> <p>Further information on levels of growth allocated to each of the aforementioned settlements, is detailed in Strategic Policy 4: Homes, and related Detailed Policies.</p>
<p>Suggestion that a percentage cap be introduced and factored into Housing Growth Allocations to ensure sufficient lands are identified.</p>	<p>The Council considers that the continuous monitoring of the LDP to measure the uptake and remaining supply of housing land within the Borough will highlight if or when the LDP needs to be reviewed and amended. This will ensure sufficient housing lands are available during the LDP period, 2015 to 2030.</p> <p>Further information on monitoring is within Plan Strategy Appendix C.</p>
<p>Houses should be allocated to the countryside to support growth and sustain rural economy.</p>	<p>The countryside is one the Borough's greatest assets and is already home to a significant proportion of the Borough's population. The Council is committed to balancing the need for sustainable residential development in the countryside, in order to sustain rural communities, with the protection and</p>

	<p>enhancement of the character and value of the countryside. Consequently, the countryside has been included within the Plan Strategy Settlement Hierarchy, and allocated a sustainable growth allocation of 750 units for the LDP period, 2015 to 2030. This will be delivered through the application of the current policy approach set out in the SPPS.</p> <p>Further information on this is in Strategic Policy 4: Homes, and related Detailed Policies, along with Evidence Paper 6: Housing, which supplements the Plan Strategy.</p>
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Existing Housing Commitments

- 7.9 The POP noted that a number of zoned housing sites within legacy area plans already benefit from extant planning permission, and indeed some are partially constructed. Several other sites, including some of the larger zonings are currently the subject of live planning applications. To provide certainty going forward for the development industry it is considered that the existing zoned housing sites identified in BMAP and the Antrim Area Plan should be carried forward into the Council's new LDP. Therefore, it is proposed that there should be no de-zoning of housing land unless it can be demonstrated that there is no reasonable prospect of a specific site being delivered for housing purposes.
- 7.10 In the POP, the Council asked stakeholders if there was agreement on the consideration that unimplemented housing zonings should be carried forward into the LDP, and received the following comments:

EXISTING HOUSING COMMITMENTS	
Main Comments	Consideration
Suggestion that uncommitted housing zonings should be subject to a feasibility assessment before being taken forward in the new LDP, with the recommendation that if the prospect of development on zoned land is unlikely then the zoning should be removed and alternative lands identified.	Evidence Paper 6: Housing, which supplements the Plan Strategy, demonstrates that the vast majority of housing zonings in legacy area plans are either built on or committed. Those that remain uncommitted are considered part of the fabric of the urban area. It is also anticipated that the level of remaining zoned uncommitted lands will reduce over time and in advance of the Local Policies Plan.

	<p>It is the role of the Plan Strategy to set out the approach that growth is based upon, taking account of existing commitments. The Local Policies Plan will confirm which sites will come forward for housing.</p>
<p>Suggestion that a survey/audit be carried out on existing land to determine whether owners/developers are willing to provide their land for future housing development and therefore highlight 'deliverability'.</p>	<p>The Council's position is that growth is based on existing commitments. The majority of housing zonings already have live planning permissions or have been built upon. The Council takes this as an indication of intent to develop land.</p>
<p>Suggestion that unimplemented zonings that do not benefit from implementable planning permission should be de-zoned to allow more suitable sites to be brought forward.</p>	<p>As mentioned, it is the Council's position is that growth is based upon existing commitments. The majority of housing zonings already have live planning permission or have been built on. Remaining sites are part of the fabric of the urban settlement and are largely regarded as acceptable for development.</p> <p>Zoned uncommitted sites will be reviewed to determine if there are any new constraints and identified at the Local Policies Plan stage.</p>
<p>Questions raised regarding the validity and sustainability of the proposal not to remove existing housing land zonings and keep them for consideration as a long-term land reserve beyond the LDP end date. This approach is considered as inconsistent with the approach advocated by RG 8 of the RDS.</p>	<p>The vast majority of housing zonings in legacy area plans are either built upon or committed and therefore these cannot be de-zoned.</p> <p>Remaining sites are part of the fabric of the urban settlement and are largely regarded as acceptable for development. Uncommitted zone sites will be reviewed and identified at the Local Policies Plan stage.</p> <p>The largest long-term housing supply is in Ballyclare, and it is not anticipated that all of this will be built during the lifetime of the LDP, up to 2030. This location is the subject of a number of live planning permissions and therefore cannot be de-zoned. The Council's Spatial Growth Strategy therefore recognises this as long-term housing.</p>

<p>Objection to the Council's preferred option on the basis that lands zoned in the Antrim Area Plan now serve as habitats for wildlife.</p>	<p>The vast majority of legacy housing sites are already built on or committed, and the remaining sites are largely within the urban fabric of the settlement.</p> <p>Those that remain uncommitted will be assessed by Planning Officers to ascertain their suitability to be carried forward to the Local Policies Plan. One of the tests will evaluate the environmental capacity, noting the various aspects of nature conservation.</p> <p>In some instances, the application of Key Site Requirements will protect or, where possible, enhance the biodiversity of a site. Where it is demonstrated that a site cannot be delivered, it may be de-zoned and a more suitable use found.</p> <p>The Local Policies Plan, including its housing sites, will be subject to a Sustainability Assessment.</p>
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Carnmoney Hill Housing Zonings

- 7.11 The future of two proposed housing zonings in BMAP for Carnmoney Hill was raised in the POP. These lands involve a Council interest as outlined below.
- 7.12 The development of the two housing zonings on the lower slopes of Carnmoney Hill (BMAP reference MNY 04/27 and MNY 04/29, as published in September, 2014), is conditional on a previously agreed transfer of a significant area of remaining agricultural and open land comprising the upper slopes of Carnmoney Hill to the legacy Newtownabbey Borough Council in order to promote public access, perhaps in the form of a County Park.
- 7.13 The Council's POP Preferred Option is to retain the two BMAP zonings, as the condition to transfer land would offer long-term potential for the Council to develop a large area of public open space, extending from O'Neill Road, along Glebe Road to Ballyduff Road, and the existing Millennium Park at Knockenagh Avenue.
- 7.14 The main comments received during the POP public consultation regarding this matter are considered overleaf:

CARNMONEY HILL HOUSING ZONINGS

Main Comments	Consideration
Lands on Carnmoney Hill should be inextricably linked with BMAP housing zonings.	Specific housing sites will be confirmed at the Local Policies Plan and the Council continues to progress the provision of public access to Carnmoney Hill for the benefit of the Borough.
Carmmoney Hill should be zoned as Open Space	Where appropriate, the designation of open space will be included in the Local Policies Plan. In the Plan Strategy, Carnmoney Hill has been identified as a Strategic Landscape Policy Area, in light of its scenic quality and environmental value. Further information on this designation is detailed in Strategic Policy 8: Natural Heritage, and related Detailed Policies.
Suggestion for bespoke policy in relation to Carnmoney Hill and that BMAP Key Site Requirements be included and retained in the new LDP.	Specific housing sites will be confirmed at the Local Policies Plan and the Council continues to progress the provision of public access to Carnmoney Hill for the benefit of the Borough. Carmmoney Hill has been identified in the Plan Strategy as a Strategic Landscape Policy Area, in light of its scenic quality and environmental value. Further information on this designation is detailed in Strategic Policy 8: Natural Heritage, and related Detailed Policies.

Other Housing Comments

The POP stimulated much debate surrounding the topic of housing and further main comments on the issue are considered below:

OTHER HOUSING COMMENTS	
Main Comments	Consideration
There is a need for more social, affordable housing, and housing for the elderly.	It is a Strategic Objective of the Plan Strategy to provide a diverse choice of housing. This Objective will be realised through the application of Strategic Policies 4: Homes, and 6: Placemaking and Good Design, and related Detailed Policies.

	Further information on these matters can be found within Evidence Paper 6: Housing, which supplements the Plan Strategy.
<p>There is a profound tension between delivering housing and safeguarding finite environmental capacity.</p> <p>New housing developments should not compromise environmental integrity.</p>	<p>The Council is committed to balancing the need for sustainable development in order to sustain communities, against the protection and enhancement of the character and value of the Borough's landscape and natural assets. Where appropriate, the application of Key Site Requirements may be used to ensure any negative impact of development will be mitigated, or where possible, enhancement of natural heritage features to ensure the environmental integrity of the site is not compromised.</p> <p>The Plan Strategy has been subject to a Sustainability Appraisal to ensure the correct balance has been achieved. The contents of the Local Policies Plan will likewise be subject to a Sustainability Appraisal.</p>
Single dwellings in the countryside should also be curtailed, as such an option does not contribute towards furthering sustainable development.	<p>The Council recognises the need to sustain rural communities, and in order to achieve this in a sustainable manner, a balance between the provision of residential development, and the protection and enhancement of the character and value of the countryside must be achieved.</p> <p>Consequently, the Plan Strategy includes a bespoke planning policy for residential development in the countryside within Strategic Policy 4: Homes, and related Detailed Policies. These are in line with the direction of current regional planning policy. These policies will manage rural residential development to ensure it is appropriate to the surrounding countryside setting.</p> <p>The aforementioned policies have been subject to a Sustainability Appraisal.</p>

Housing zonings should be developable and have a reasonable expectation of coming forward for residential development.	<p>The Council's position is that growth is based on existing commitments. The majority of housing zonings already have live planning permissions or have been built on. Remaining sites are part of the fabric of the urban settlement and are largely regarded as acceptable for development.</p> <p>Specific sites will be identified at the Local Policies Plan stage. Remaining zoned uncommitted sites will be reviewed to consider if they are subject to any new constraints and their position will be confirmed at this stage.</p>
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8 Planning Policy – Main Issues Raised

- 8.1 Once the Council's Local Development Plan (LDP) Plan Strategy is adopted, its planning policy will be used to determine all planning applications within the Borough, along with any material considerations. Through the Preferred Options Paper (POP), the Council invited comments from stakeholders on the preferred planning policy approach. These are considered in the tables below.

General Policy

- 8.2 The POP and its supplementary Review of Operational Planning Policy Evidence Paper provided background context on extant operational planning policy. They highlighted what will happen to Departmental planning policy when the Council publishes its new LDP, which is of particular importance at this early stage of the process.
- 8.3 The Strategic Planning Policy Statement (SPPS) sets out transitional arrangements to explain this. In summary, once the Plan Strategy is adopted and published, the existing Departmental planning policy retained by the SPPS will no longer apply within the Borough and the planning policy contained within the Council's new LDP will apply instead.
- 8.4 Main comments received during the POP public consultation are as follows:

GENERAL POLICY	
Main Comments	Consideration
Strong support for the preferred option relating to the review of policy – fulfils the	The Council welcomed support for its approach to the review of planning policy and transitional arrangements.

transitional arrangement as set out in the SPPS.	The Council has used this opportunity to provide Strategic Objectives and planning policy that is not only robust and up-to-date, but is tailored to meet the needs of the Borough.
Development of operational policy for inclusion in the LDP should be guided primarily by policy set out in the Regional Development Strategy (RDS) and SPPS, analysis of LDP evidence base and by the LDP Vision and Objectives.	The Council has prepared the Plan Strategy in line with legislation, taking account of the RDS, the SPPS, and guidance issued by the Department for Infrastructure. Planning Officers have based the Plan Strategy on a robust evidence base as outlined in the supplementary suite of Evidence Papers.
Operational Planning Policies retained under transitional arrangements have not been subject to Sustainability Appraisal (SA). The act of incorporating this policy within a LDP may mean that these provisions should also be the subject of SA incorporating Strategic Environmental Assessment (SEA) - failure to do so may raise issues of soundness.	This point is noted. Policies in the Council's new LDP will be subject to a Sustainability Appraisal, incorporating a Strategic Environmental Assessment.
Support for the retention of supplementary guidance, such as Creating Places, Living Places and Building on Tradition.	The Council recognises the value of such supplementary guidance. These documents are retained by the SPPS as supplementary guidance.
The LDP should be the point at which consideration of the potential need for, and use of, planning agreements begins - requirement to work with infrastructure providers, other local authority departments and consultees. Broad principles including the items for which contributions will be sought and the occasions when they will be sought should be set out in the LDP.	<p>The Council seeks to deliver positive development in the Borough and as such, any necessary works required to facilitate a development proposal may be sought through developer contributions. These contributions will be secured through a variety of mechanisms including planning agreements under Section 76 of the Planning Act (Northern Ireland) 2011.</p> <p>Throughout the preparation of the Plan Strategy, Planning Officers have discussed policies and proposals with key consultees, and the LDP will enable sustainable infrastructure and service provision to meet the needs of the Borough during the LDP period, 2015 to 2030.</p> <p>In addition to this, applicants must work with statutory bodies both prior to and</p>

	<p>during the planning application phase of development to ensure connection to applicable infrastructure and services are possible.</p>
<p>When compiling policy, consideration should be given to the policies contained within Sustainable Water - A Long Term Water Strategy.</p>	<p>During the preparation of the Plan Strategy, Planning Officers have taken account of this document and have consulted with NI Water to ensure the sustainable provision and management of water within the Borough. This is reflected in Strategic Policy 5: Community Infrastructure, and related Detailed Policies.</p>
<p>Policy should consider the original intent or historic design and growth of the layout of the settlement as well as heritage assets in the settlement and associated landscaping.</p>	<p>The Council recognises the intrinsic value of the Borough's natural and built heritage assets, which often reflect how each settlement has evolved over time.</p> <p>With regard to these matters, Planning Officers updated the evidence base in line with Departmental guidance by preparing a Settlement Evaluation Evidence Paper and a Landscape Character Assessment. In order to protect and enhance these assets, the Plan Strategy includes a collection of Strategic Policies and related Detailed Policies.</p>
<p>The POP and supporting documentation do not offer a detailed review of existing policy, nor the Council's preferred option on the new policy approach. Interim Sustainability Appraisal does not appraise the implications of the Council's preferred option in relation to existing operational policies. Suggestion made regarding the wording for utilising established renewable energy sites.</p>	<p>The POP was published alongside a supporting document entitled 'Review of Operational Planning Policy Evidence Paper' (January 2017), which detailed the Council's position on Central Government's suite of planning policy.</p> <p>A Sustainability Appraisal Interim Report also accompanied the POP. This documented the appraisal of POP options and alternatives against a sustainability framework, which helped the Council determine each Preferred Option.</p> <p>Policies in the LDP will be subject to a Sustainability Appraisal, incorporating a Strategic Environmental Assessment.</p> <p>The Council acknowledges the benefits of repowering renewable energy</p>

	developments and has taken account of these comments, which have been reflected in Strategic Policy 9: Natural Resources, and related Detailed Policies.
Suggestion that greenbelts should be reinstated in rural areas.	The Council considers that the countryside policies in the Plan Strategy are sufficient for the needs of the Borough and in line with the SPPS, which takes forward the provisions of PPS 21 Sustainable Development in the Countryside, which removed former green belt designations. The Council's LDP policies will endeavour to secure the orderly development of land whilst protecting and enhancing the natural environment within the rural area.
Living Places, Building on Tradition, Creating Places and Development Control Advice Notes (DCANs) should remain as material considerations.	The Council recognises the value of such supplementary guidance. Where appropriate, the Plan Strategy policies refer to these documents, the majority of which are retained by the SPPS. The Council will continue to apply Departmental DCANs until such times as the Council publishes its own, where considered necessary.
The LDP should be fully rural proofed. It would have been helpful to see issues screened at POP stage.	The Council is committed to fulfilling its requirements under the Rural Needs Act 2016, and to ensure due regard is given to rural areas when developing, adopting and implementing the LDP. The Plan Strategy has undergone a Rural Needs Assessment, the results of which have been published alongside the Plan Strategy. This will be revisited at Local Policies Plan stage.
Climate change and air quality should be treated as two separate issues.	The Plan Strategy approach to these matters is consistent with current regional policy and guidance, which endeavours to reduce carbon footprints and to facilitate mitigation and adaption to climate change, whilst improving air quality. Further information can be found in Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies.

<p>The EU target to reduce carbon emissions by at least 40% by 2030 should be reflected in planning policy.</p>	<p>EU targets have been included within current regional planning policy and guidance, which the Plan Strategy has taken account of. The application of Strategic Policies and their related Detailed Policies will aid the reduction of greenhouse gases.</p> <p>Further information can be found in Plan Strategy Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies.</p>
<p>Options should be realistic and demonstrate a linkage with regional policy.</p>	<p>In line with the Department for Infrastructure's tests of soundness, the Plan Strategy has taken account of current regional policy and guidance. This is detailed on numerous occasions throughout the Plan Strategy, with further detail contained within the supplementary suite of Evidence Papers that supplement the Plan Strategy.</p>
<p>There should be justification for decisions, policies, options and proposals.</p>	<p>Each Strategic Policy and related Detailed Policy within the Plan Strategy is accompanied with explanatory text to provide justification on the approach taken, and why the policy is required to meet the LDP Strategic Objectives.</p> <p>Further background information has been detailed in the supplementary suite of Evidence Papers that supplement the Plan Strategy.</p>

Overarching Primary Principles for Policy

- 8.5 The POP introduced seven Overarching Primary Principles. These set the context in which the Council will develop new planning policy within its new LDP, and will apply to all development proposals once the Plan Strategy is published.
- 8.6 These seven POP Overarching Primary Principles reflected and supported common themes emerging from the POP Plan Vision and Objectives, the Council's Corporate Plan and Community Plan. These Principles also reflected and supported Departmental supplementary planning guidance, including the SPPS. In the POP, the Council asked if there was agreement with these seven Overarching Primary Principles, and main comments received during the POP public consultation are as follows:

OVERARCHING PRIMARY PRINCIPLES FOR POLICY	
Main Comments	Consideration
The Department for Infrastructure advised that in introducing Overarching Primary Principles, the Council should ensure that they do not duplicate the Core Planning Principles already contained in the SPPS. They requested that the Council clarified the purpose of the Overarching Primary Principles and their relationship to the LDP Objectives. New planning policy drawn up should sit within the context of the LDP Objectives.	The Council welcomed these comments and has taken them into consideration during the preparation of the Plan Strategy. Planning Officers considered the Overarching Primary Principles as presented in the POP, should be incorporated within the Plan Strategy Strategic Objectives and Strategic Policies.
Community Involvement could be listed as an Overarching Primary Principle to assist with placemaking.	Whilst the POP Overarching Primary Principles have now been incorporated within the Strategic Objectives and Strategic Policies, the Council recognises the value of quality placemaking and community involvement. Community involvement in the planning process is a legislative requirement and the Council has published a Statement of Community Involvement guide to the public consultation process.
Disagreement with the Overarching Primary Principles as they fail to address furthering sustainable development and improvements to well-being for all. Development is not inherently sustainable and will only become sustainable when it incorporates environmental and social consideration.	<p>The Council is committed to its responsibility to promote and enable sustainable development. The POP Overarching Primary Principles have been incorporated into the Plan Strategy Strategic Objectives and Strategic Policies.</p> <p>Whilst the pillars of sustainable development are reflected throughout the LDP, in the Plan Strategy, Strategic Policy 1: Sustainable Development is specifically dedicated to this theme. In addition, the LDP is subject to a Sustainability Appraisal incorporating a Strategic Environmental Assessment.</p>
Overarching Primary Principle 1 is a generic statement with little substance or direction.	As mentioned, the POP Overarching Primary Principles have now been incorporated within the Plan Strategy Strategic Objectives and Strategic Policies. POP Overarching Primary

	Principle 1 considered sustainable economic growth. Within the Plan Strategy, this matter is considered throughout a number of Strategic Objectives and specifically within Strategic Policy 2: Employment, and Detailed Policies.
Overarching Primary Principle 2 should be more ambitious than simply seeking to reduce greenhouse emissions - take note of paragraph 3.13 in SPPS.	The Council is committed to help mitigate and adapt to climate change. This POP Overarching Primary Principle is now reflected in Plan Strategy Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies. The LDP presents a 'fabric first' approach to reducing greenhouses gases.
Support for Overarching Primary Principle 3.	The Council welcomes this support for Overarching Primary Principle 3, which considers quality of life. In the Plan Strategy, this has now been included in a number of the Strategic Objectives and reflected in Strategic Policies and their related Detailed Policies.
Suggestion that the term 'Built Heritage' should be included in Overarching Primary Principle 4.	It is apparent that POP Overarching Primary Principle 4 – Quality of Place does include the wording ' <i>...our built and natural heritage...</i> ' (POP, p.100). Whilst the Plan Strategy has not brought forward Overarching Primary Principles, it has included the consideration within the LDP Vision and Strategic Objective 7.
Overarching Primary Principle 4 is currently devoid of any demonstration of furthering sustainable development.	Overarching Primary Principle 4 proposes the conservation of the Borough's built and natural heritage, and the Council considers this demonstrates positive action towards sustainable development. In the Plan Strategy, this is reflected in the Plan Vision and Strategic Objective 7.
Overarching Primary Principle 5 fails to address environmental protection and the objective should include the protection and enhancement of the natural and historic environment. Under the Wildlife and Natural Environment Act 2011, the Council has a	The Council welcomed these comments, which have been reflected in the Plan Strategy Vision, along with Strategic Objectives 7 and 11 and relevant policies in the LDP.

duty to further biodiversity which is absent from this principle – this should be amended accordingly.	
Ensure that the Overarching Primary Principles complement the 5 Core Planning Principles set out in the SPPS and do not duplicate the approach already contained within the SPPS.	The SPPS Core Planning Principles have been taken account of during the preparation of the Plan Strategy.
Overarching Primary Principle 6 lacks ambition and direction and is much too narrow in its scope.	The Council has taken these comments into consideration. Whilst this Overarching Primary Principle has not been included within the Plan Strategy, its approach to energy and natural resources has been included within the Plan Vision and Strategic Objective 12 and relevant policies.
Overarching Primary Principle 7 - caution should be taken with regards to the wording of this, it must be clear so as to avoid an interpretation that planning permission can be bought or sold.	This Overarching Primary Principle relates to the delivery of community benefits and developer contributions. Whilst the Overarching Primary Principles have not been brought into the Plan Strategy, the Council has clarified its position on developer contributions within Strategic Policy 1: Sustainable Development.
Strong support for the LDP principle of requiring developers to bear the cost of work required to facilitate development (Overarching Primary Principle 7 – Community Benefits).	The Council welcomed this support and, whilst Overarching Planning Policies have not been brought forward into the Plan Strategy, the Council considers this to be a sound approach. As mentioned above, Strategic Policy 1: Sustainable Development includes developer contributions, where they are required to support the delivery of development.
Furthering on from Overarching Primary Principle 7 – Community Benefits, which states that developers will be expected to meet the costs of infrastructure and other works required, there was a strong recommendation for the introduction of a developer contributions policy, which can provide affordable housing.	<p>The Council considers this suggestion appropriate, and has included related policy within the Plan Strategy, Strategic Policy 1: Sustainable Development. Where appropriate, the Council will support this policy with supplementary guidance.</p> <p>In addition, the Plan Strategy also provides direction on the provision of affordable housing within the Borough. This is within Strategic Policy 4: Homes,</p>

	and related Detailed Policies, with further information provided in Evidence Paper 6: Housing, which supplements the Plan Strategy.
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Preliminary Policy Review

- 8.7 The POP concluded that the broad thrust and direction of extant operational planning policies were generally acceptable and working effectively. The policies were grouped into three main categories: Facilitating Economic Development; Meeting the Needs of Society; and, Shaping our Environment. The existing operational planning policy contained within each of these three categories are then examined within the POP.

9 Facilitating Economic Development

- 9.1 In the POP public consultation document, this group of policies discussed the options in the approach of planning policy in relation to Economic Development, Environmental (Natural) Resources, and Retail and Commercial Development. In the POP they were examined in turn, as follows:

Employment and Industry

- 9.2 The POP highlighted that as part of the policy development, the Council has reviewed the extant Departmental operational policies relating to employment in a number of planning policy documents including PPS 4 Planning and Economic Development, PPS 21 Sustainable Development in the Countryside, and the relevant provisions of Planning Strategy for Rural Northern Ireland. The Council found the broad thrust and direction of extant operational planning policy to be generally acceptable. In the POP, we asked if there were any factors the Council should consider in the new employment policy, or if there were any further issues in relation to employment and industry that the Council should consider. Main comments received during this POP public consultation are as follows:

EMPLOYMENT AND INDUSTRY POLICY	
Main Comments	Consideration
Consideration should be given to an amendment to the provisions of Policy PED 7 of PPS 4 Planning and Economic Development to allow residential development to occur on appropriate sites	The Council welcomed this suggestion and recognises that it could provide opportunities for redevelopment of brownfield sites and promote urban regeneration. It is also in line with the approach contained in current regional

previously used/no longer suitable for employment.	policy. This has been included in the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies. Where appropriate, proposals for residential development will be considered.
Economic growth should be focused on clusters of hubs in accordance with the RDS.	The Plan Strategy has taken account of the cross boundary cluster of hubs that consist of Ballymena, Antrim and Larne, as identified in the RDS. This cluster has a potential advantage of attracting business due to its good connections. This is the reasoning behind the safeguarding of existing SELs and the inclusion of new SELs in Antrim and Ballyclare.
Introduce planning agreements and/or conditions for major developments to include a social clause.	<p>The Council recognises the benefits of procedures such as planning agreements and applying conditions to secure planning matters. In the Plan Strategy, this is a consideration of Strategic Policy 1: Sustainable Development, where many of the suggested contribution opportunities have a wider community benefit.</p> <p>The Council will further consider these mechanisms on a site-by-site basis during the preparation of the Local Policies Plan stage.</p>
Ensure provision for businesses outside of Invest NI's remit in order to provide a choice and variety of sites.	<p>It is a Strategic Objective (SO 2) of the Plan Strategy to establish the Borough as a premier business location, where both existing and new innovative, cultural, and creative enterprises can prosper. This Objective will be achieved through the application of planning policy contained within the LDP, specifically Strategic Policy 2: Employment, and related Detailed Policies.</p> <p>In preparation of these policies, and in line with Departmental guidance to update the LDP evidence base, the Council commissioned an assessment of the Borough's employment land portfolio, known as an Employment Land Evaluation Report (ELER). The ELER can be read at Appendix 1 of Evidence</p>

	<p>Paper 3: Economic Growth. This practice is a recommendation of the RDS.</p> <p>The Council's ELER identified that sufficient choice and variety of sites was currently provided in Metropolitan Newtownabbey, whilst it was predicted that there would be a need for additional employment land in Antrim and Ballyclare. The Plan Strategy subsequently safeguards existing employment land and proposed new SELs in Antrim and Ballyclare, the boundaries of which will be defined in the Local Policies Plan.</p> <p>Throughout the LDP period 2015 to 2030, the Council will continue to monitor the uptake and development of employment land. Further information on monitoring is included at Appendix C of the Plan Strategy.</p>
Secure supplies of renewable energy in attracting employment and investment. When zoning, it may be useful for Councils to assess the availability of local groundwater resources.	<p>The Council will continue to work with energy supply providers to ensure a coherent approach. The Council will welcome proposals that integrate renewable energy technologies into their design, furthering sustainable development. This has been reflected in the Plan Strategy Strategic Policy 9: Natural Resources, and related Detailed Policies.</p>
Seek to identify policies and measures to achieve more sustainable forms of travel to the BIA area and proposed SEL.	<p>The Council will continue to work with key stakeholders to provide a collaborative approach to improve connectivity. Within the Plan Strategy, Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies promote more sustainable patterns of transport and travel throughout the Borough.</p> <p>The Council will continue to liaise with key stakeholders, including the Department for Infrastructure, to enable enhanced connectivity to BIA. The Council supports the Department's plans to upgrade roads that link BIA to the wider area.</p>

<p>Smaller non-strategic industrial and business areas – such locations to be afforded strong policy protection as they provide opportunities to those businesses for which a setting within a SEL may not be suitable.</p>	<p>The Council acknowledges the diverse needs of the varying businesses within the Borough. In line with Departmental guidance, the Council updated its evidence base and commissioned an assessment of the Borough's employment land portfolio. Subsequently, the Plan Strategy identifies a range of Local Employment Sites within the top three-tier settlements. Within the Plan Strategy, these locations will be supported by Strategic Policy 2: Employment, and related Detailed Policies.</p>
<p>Rural businesses – important for them to be afforded some opportunity to develop and grow in situ. Introduction of succinct, tailored rural bespoke policies for rural enterprise, permitting the expansion of established rural economic development. Ensure there is provision for small rural businesses to help sustain and grow peripheral rural areas.</p>	<p>The Council recognises there is a wide range of businesses located outside of the Borough's settlements, within the rural area. The Plan Strategy subsequently makes provision for these instances within Strategic Policy 2: Employment, and related Detailed Policies. These policies have been subject to a Rural Needs Assessment, the results of which have been published alongside the Plan Strategy. This will be revisited at Local Policies Plan stage.</p>
<p>Any industrial element of a mixed-use proposal should be served by separate entrance arrangements in order to preserve public safety.</p>	<p>The Council wishes to achieve a Borough where its citizens live in connected and safe places. Planning Officers assess all development proposals for appropriate access arrangements. Road safety is amplified in the Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies.</p>
<p>Policy contained within PPS 4 Policy PED 7 relating to zoned employment land is excessively restrictive. It generally confines development on zoned employment land and land last used for employment uses to that falling within B1, B2, B3 or B4 uses, with an exception allowing sui generis employment uses only. PED 7 has led to the loss of other acceptable employment generating investment.</p>	<p>The Council wishes to adopt a sustainable approach to delivering economic development, one that combines the concentration of people, goods, services, and infrastructure. Subsequently, the Plan Strategy provides policy within Strategic Policy 2: Employment that safeguards Strategic Employment Lands, whilst including</p>

	options for the acceptable alternative use of Local Employment Land sites.
Call for fulltime permanent living wage jobs, not minimum wage, zero hours contracts, or agency work. People need long-term security.	The Council welcomes employment opportunities and economic prosperity for its citizens and those wishing to invest in the Borough. This can be facilitated spatially through the Council's LDP by designating employment land, however, employment hours and pay are aspects which are beyond the remit of a LDP.

Tourism

- 9.3 As part of policy development, the Council reviewed planning policy relating to tourism in a number of planning policy documents, including PPS 16 Tourism. The Council considered the broad thrust and direction of extant operational planning policy to be generally acceptable. The POP asked stakeholders if there were any factors the Council should consider in the new tourism planning policy. The main comments received during the POP public consultation are as follows:

TOURISM POLICY	
Main Comments	Consideration
The LDP should recognise the existing hub of tourist attractions in Antrim – the Lough Shore, Allen Park, Antrim Boat Club, Shane's Castle Estate, Antrim Castle Gardens, Antrim Forum, and Massereene Golf Club. The location has the capacity to accommodate further and complimentary sustainable tourism development.	In line with current regional policy and the Council's Tourism Strategy, the Plan Strategy encourages a sustainable approach to the promotion of the Borough's tourism assets with opportunities for further sustainable growth. Further information can be found within the Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies.
The general opinion that PPS 16 Tourism is acceptable and that no amendments to policy provisions are required.	The Council welcomed this comment and considered the broad trust and direction of PPS 16 to be generally acceptable. The Plan Strategy takes account of PPS 16, along with current regional policy and guidance, and the Council's Tourism Strategy. These are specifically included in Strategic Policy 2: Employment, and related Detailed Policies.

<p>There is potential for cross boundary tourism initiatives at Lough Neagh and Lough Beg.</p>	<p>The Council recognises the potential for sustainable tourism opportunities at Lough Neagh and Lough Beg. Planning Officers have worked, and will continue to work, closely with key partners and neighbouring Councils on the Lough Neagh/Lough Beg Forum Working Group, which has influenced the Plan Strategy. Site-specific matters will be addressed in the Local Policies Plan.</p> <p>Opportunities for cross boundary tourism proposals will be taken forward through the Council's separate forthcoming Tourism Strategy and the LDP will respond accordingly where appropriate.</p>
<p>There is a greater need for reference to be made to the historic environment in relation to tourism.</p>	<p>The Council has ensured the Plan Strategy acknowledges the important role that the Borough's built heritage assets have in the promotion of tourism. Further information can be found in Strategic Policy 2: Employment, and Strategic Policy 7: Historic Environment, and their related Detailed Policies.</p>
<p>New policy should do more to encourage sustainable and high quality tourism opportunities.</p>	<p>The aim of the Plan Strategy tourism policies within Strategic Policy 2: Employment and related Detailed Policies is to promote a sustainable approach to tourism development, to protect a varied range of tourism development opportunities, to facilitate the development of tourism infrastructure and to enhance the urban environment.</p>
<p>The Borough lacks static caravan provision and touring caravan sites are at capacity.</p>	<p>The Plan Strategy tourism policy supports the provision of a range of tourist accommodation at easily accessible locations across the Borough. Each application will be assessed on its own merits, against prevailing planning policy.</p>
<p>Request for supplementary advice to be provided in respect of the existing PPS 16 Policy TSM 7, which sets design criteria</p>	<p>The Council welcomed this comment, which has subsequently been addressed in Plan Strategy Strategic Objective 6, and Strategic Policy 6: Placemaking and Good Design, and related Detailed</p>

seeking 'a movement pattern that meets the needs of people whose mobility is impaired'.	Policies. This is in line with current regional policy and the Council's Community Plan. Proposals will be required to demonstrate how they considered the needs of users with impaired mobility.
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Environmental Resources

- 9.4 The Council's environmental resources (which, as grouped in the POP, included minerals, waste, and renewable energy) are both a source of economic employment and energy creation. The LDP has a key role in bringing forward policies to ensure the sustainable use of these resources.
- 9.5 As part of policy development, the Council reviewed a number of planning policy documents relating to these topics including the relevant provisions of Planning Strategy for Rural Northern Ireland, PPS 18 Renewable Energy, and PPS 11 Planning and Waste Management. The Council has found the broad thrust and direction of these documents to be generally acceptable.
- 9.6 The POP asked stakeholders if there were any further factors it should consider in relation to the new policy for minerals, energy, and waste. The main comments received during this POP public consultation are as follows:

ENVIRONMENTAL RESOURCES POLICY (includes the topics of minerals, waste and renewable energy, as grouped in POP)	
Main Comments	Consideration
Policy needs to be set in a context that ensures levels of extraction do not exceed environmental limits, or serve to undermine the environmental integrity of wider ecosystems, whilst promoting the use of recycled construction materials. With regards to Lough Neagh and Lough Beg cross border issues, there is a need to maintain economic / environmental balance.	<p>It is one of the Plan Strategy's Strategic Objectives to ensure the responsible use of land and natural resources. This is reflected in Strategic Policies 8: Natural Heritage and 9: Natural Resources, and their related Detailed Policies, which has brought forward the current policy approach as set out in the SPPS.</p> <p>In addition, the LDP is subject to Sustainability Appraisal incorporating Strategic Environment Assessment.</p> <p>The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015 and The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 will also apply in the development management process.</p> <p>Cross boundary planning issues will be considered by Planning Officers at</p>

	various local authority partnerships, such as the Greater Belfast Development Working Group, the Regional Minerals Working Group, and the Lough Neagh/Lough Beg Forum.
Strong recommendation that the Council takes appropriate economic assessments on Aggregate and Mineral resources. Suggestion to make contact with operators to identify - 1) tonnage of mineral reserve within current planning permission 2) tonnage of reserve in their ownership 3) average annual extraction tonnage.	<p>The Council worked with key partners to identify economically viable mineral resources within the Borough. These partners included the Department for the Economy (DfE), Geological Survey of Northern Ireland (GSNI), along with mineral industry representatives and operators within the Borough. The DfE has responsibility in coordinating the Quarries Annual Returns, which mineral operators have a legal duty to complete. The results of these Returns are an evidence base for the LDP.</p> <p>Subsequent to working with these key partners to identify economically viable resources, the Plan Strategy identifies Crumlin lignite deposit as a mineral reserve, with specific policy described in Strategic Policy 9: Natural Resources, and related Detailed Policies.</p>
Planning permission should not be granted for peat extraction from new or extended sites, or renewal of extant permissions.	The policy approach in Plan Strategy Strategic Policy 9: Natural Resources, and related Detailed Policies ensures there is a balance between the need for peat, and the need to protect and conserve these special habitats in line with the SPPS.
Policy must require proposals to contain details of sustainable restoration. Recognition that mineral sites have the potential to enhance biodiversity and become a public benefit through restoration. There should be reference to 'sand extraction' as it will be required for habitat restoration post extraction.	The Plan Strategy Strategic Policy 9: Natural Resources and related Detailed Policies will seek to ensure appropriate and timely site restoration of all mineral proposals.
Scotland's National Peatland Plan should be a template for Northern Ireland.	During the preparation of the Plan Strategy, Planning Officers took account of this document. However, it is outside the remit of a LDP to provide regional level policy and guidance, such as

	Scotland's National Peatland Plan: Working for our Future, 2015.
Suggestions that the Royal Society for the Protection of Bird's (RSPB's) 'Habitat Creation for the Minerals Industry is made reference to.	The Council has noted this publication, which was taken account of during the preparation of the Plan Strategy and in particular, Strategic Policy 9: Natural Resources, and its Detailed Policies, which discuss sustainable mineral development. In due course, the Council will consider publishing supplementary guidance on site restoration.
Clarification sought on timescales for implementing the Review of Old Mineral Permissions (ROMPs).	The implementation of ROMPs legislation is outside the remit of a LDP. The Department of Infrastructure has advised the Council that there is currently no timetable for commencing the ROMPs provisions within the 2011 Act.
Unconventional Hydrocarbon Extraction - policy should be replicated in LDP from SPPS.	The Council is required to take account of regional guidance and its approach to unconventional hydrocarbon extraction is set out in Strategic Policy 9: Natural Resources and related Detailed Policies.
Strong recommendation for the development of mineral safeguarding policy. Argument against any policy that would prejudice constraint on mineral development in Areas of Outstanding Natural Beauty (AONB's). Suggestion that these should be permitted under conditions. Opposition to the adoption of Areas of Mineral Constraint (AMCs). Prior to identification of such areas, the Council must identify supply and demand for local aggregates and identify local aggregate and mineral reserves.	The Plan Strategy applies a balanced approach to the need for mineral resources and the protection of the environment. This is reflected in Strategic Policy 8: Natural Heritage and 9: Natural Resources, and their related Detailed Policies.
Support for Areas of Mineral Reserve/Mineral Safeguarding Areas, which should be given legislative protection and identified around existing operational sites.	The Plan Strategy identifies known economically viable mineral reserves (Crumlin lignite) that are at risk of surface sterilisation and these deposits will be safeguarded, with boundaries defined in the Local Policies Plan. The approach to minerals is set out in Strategic Policy 8: Natural Heritage and

	9: Natural Resources, and their related Detailed Policies.
<p>Concern was expressed regarding lack of commentary and analysis in respect of peat extraction sites, its contribution and the Council's view regarding areas of mineral constraint. Lack of direction and allocation of areas of mineral constraint is concerning and it is hoped this is reconciled at the next stage of the LDP.</p> <p>Further endeavours from the Council are welcomed regarding the extent of minerals and mineral development, the value of this sector to the economy and impacts of such developments on the environment and wider society. Recommendation that the Council should engage with all relevant stakeholders particularly Quarry Products Association Northern Ireland (QPANI).</p>	<p>The Council recognises the economic contribution that peat extraction offers to the Borough's economy. The need for a balanced approach between the economy and the environment is also recognised.</p> <p>The Plan Strategy policy approach to mineral resources and areas of constraint are set out within Strategic Policy 9: Natural Resources and related Detailed Policies. Further information is within Evidence Paper 12: Minerals, which supplements the Plan Strategy.</p> <p>Planning Officers have, and will continue to, work with key partners within the minerals industry, including MPANI (formerly QPANI), operators, the DfE, and the GSNI.</p>
<p>New developments should be energy efficient and should be delivered in a 3-tiered response - first to reduce demand, second to improve energy efficiency and thirdly to provide renewables where applicable.</p>	<p>The Plan Strategy has been prepared in the context of promoting sustainable development. Further to this, all new applications for housing are subject to Building Regulations, which consider the energy performance and carbon dioxide emission rates of properties.</p> <p>With regard to renewable energy, this approach is reflected in Strategic Policy 9: Natural Resources and related Detailed Policies.</p>
<p>POP Objective should not be limited to renewable generators but include ancillary services that facilitate the development of renewables. The Council should promote more sustainable renewable energy to meet planned growth.</p>	<p>The POP was a public consultation document and will not be reproduced with amended wording. However, matters relating to renewable energy have been included within the Plan Strategy Strategic Policy 9: Natural Resources, and related Detailed Policies.</p>
<p>Support for wind farm and renewable energy development provided they are sustainable and not located in areas damaging to wildlife. Reference made to the call for evidence for renewable energy development relating to the SPPS.</p>	<p>The Plan Strategy endorses sustainable development, which includes the prevention of unacceptable adverse impacts as mentioned in SPPS para. 6.224. In relation to renewable energy proposals, this is reflected in Strategic</p>

Paragraph 6.224 of the SPPS should be transferred across into any new policy (as appropriate) within the LDP.	Policy 9: Natural Resources and related Detailed Policies.
The proliferation of wind generation needs careful consideration - being more prominent than a solar farm, wind generation should conform to a Borough strategy and not a piecemeal application-by-application consideration.	<p>In line with Departmental guidance, the Council updated its evidence base and undertook a Landscape Character Assessment. This has been reflected in the number of designations such as Areas of High Scenic Value and Strategic Landscape Policy Areas, which seek to protect the countryside from excessive and inappropriate development. The boundaries of these areas will be defined in the Local Policies Plan stage. The Council also undertook a wind farm pressure analysis as part of its evidence base.</p> <p>Plan Strategy Strategic Policy 9 Natural Resources and related Detailed Policies consider the appropriate siting of renewable energy proposals.</p> <p>Further information on this matter is in Evidence Paper 13: Renewables.</p>
The Council should embrace the advantages of re-powering renewable energy projects, along with consideration of the decommissioning phase. Limited lifespan of windfarms should be factored into policies and should be flexible with windfarm layout, redevelopment and expansion.	The Council recognises that renewable energy development has a lifespan and redundant structures can become unsightly. Consequently, these matters are addressed within the Plan Strategy Strategic Policy 9: Natural Resources and related Detailed Policies.
Suggestion that the Council should list areas sensitive to wind energy developments and cite their nature designations. Further consideration should be given to sustainable bio-energy.	In line with Departmental guidance, the Council updated its evidence base and undertook a Landscape Character Assessment. This outlined the Borough's capacity to absorb further wind energy development, and is reflected in Plan Strategy Strategic Policy 9: Natural Resources, and related Detailed Policy.
The POP should reference the Northern Ireland Executive Programme for Government (PfG) target of 40% renewable energy source and should reference potential for solar energy together with	The Council's POP was a public consultation document, and it will not be reproduced with amended wording. However, the PfG targets already underpin current regional planning policy and guidance, which

considering co-location where solar and wind turbines co-exist, sharing infrastructure.	subsequently the Plan Strategy has taken account of. Further information is detailed in Evidence Paper 13: Renewables, which supplements the Plan Strategy.
There is scope to include a statement in the LDP on timely consultation with Northern Ireland Electricity (NIE) Networks in relation to the development of renewable energy projects.	The Council has considered this suggestion appropriate and as such, has referenced it in the Plan Strategy Detailed Policies that relate to Strategic Policy 9: Natural Resources.
Support for policy provision outlined within PPS 18 Renewable Energy.	The Council has taken current regional planning policy and guidance into account during the preparation of the Plan Strategy. PPS 18 has been reflected in Strategic Policy 9: Natural Resources, and related Detailed Policies.
Agreement with the precautionary approach to all waste management proposals and state that disposal of inert waste should be steered away from sensitive areas.	The Plan Strategy Strategic Policy 10: Environmental Resilience and Protection, and related policies will be used to ensure waste management proposals avoid or minimise any detrimental effects on people, the environment, and local amenity.

Retail and Commercial Development

- 9.7 The Council recognises the importance of having accessible, vibrant centres that can offer more local choice for retail, social activity, recreation and commercial leisure. Adopting a town centre first approach for retailing and other complementary functions such as commercial leisure can make a significant contribution to a town centre's vitality and viability.
- 9.8 The POP assured stakeholders that, through the LDP, the Council aimed to ensure that a good provision and choice of retail, leisure facilities and other appropriate town centre uses which can help to increase the 'dwell times', footfall and turnover in the Borough's centres, with significant benefits for daytime and evening economies would be achieved.
- 9.9 The POP asked if there were any other factors that the Council should take into consideration in relation to the LDP's new retail policy. The main comments received during this POP public consultation are as follows:

RETAIL AND COMMERCIAL DEVELOPMENT POLICY	
Main Comments	Consideration
The importance of a tightly controlled policy for out of town retailing.	The Council's Plan Strategy excludes out of centre retailing from its Hierarchy of Centres and applies a town centre first approach in order to manage unsustainable proposals. This approach is in line with current regional policy. Further details can be found within the Strategic Policy 2: Employment, related Detailed Policies, and within the Retail and Commercial Leisure Study, that accompanies the Plan Strategy.
Suggestion that retail policy should encourage and facilitate cultural, community, retail, leisure and entertainment facilities.	In line with current regional policy, the Plan Strategy Strategic Policy 2: Employment clarifies that appropriate town centre uses include retail, leisure (including evening/night-time economy uses), office, visitor accommodation, and appropriate housing and community facilities. This will support the vitality and viability of the Borough's centres.
Support for a town centre first approach, as set out in the SPPS.	The Council welcomed this support. The Plan Strategy applies a town centre first approach, which is in line with current regional policy.
Flexible policy should be devised to facilitate local shops beyond the designated centres.	Whilst the Plan Strategy adopts a Hierarchy of Centres, there is a degree of flexibility where a proposed town centre use that is located outside of the designated centres may be permitted where the sequential test has been applied and no preferable site exists. Further details can be found within the Strategic Policy 2: Employment, related Detailed Policies, and within Evidence Paper 4: Retail and Commercial Leisure Study, that accompanies the Plan Strategy.
Policy gaps between PPS 5 and SPPS need filled, e.g. local shops, petrol filling stations and service stations along main transport routes policy.	Following the POP public consultation, and in line with Departmental guidance, the Council updated its evidence base and commissioned a Retail and Commercial Leisure Study (Evidence Paper 4). This Study discussed these retail provisions.

Include a flexible policy for modern petrol filling stations and local shopping on main roads.	Subsequently, the Plan Strategy has included policies and measures, such as the sequential test, to ensure such developments occur in a sustainable manner, with no detrimental impact on the Borough's centres. These can be found within Strategic Policy 2: Employment, and related Detailed Policies.
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10 Meeting the Needs of Society

- 10.1 In the POP public consultation document, this group of policies discussed options in the planning policy approach to Residential Development, Transport and Accessibility, Open Space and Recreation, Community Development and Facilities, and Telecommunications and Public Utilities. In the POP they were examined in turn, as follows:

Residential Development

- 10.2 Good quality adequate housing is a fundamental need of society and one that can make a significant positive contribution to the character of the Borough's built environment. Access to good quality housing can enable the population of the Borough to live sustainably and pursue positive progress in their quality of life.
- 10.3 The POP clarified that as part of the policy development, the Council has reviewed planning policy documents relating to housing including PPS 21 Sustainable Development in the Countryside, and PPS 7 Quality Residential Development and its addendums. The Council found the broad thrust and direction of extant operational planning policy to be generally acceptable. The Council's POP asked if there are any factors it should address in the new housing policy, including housing in the countryside. Main comments received during this POP public consultation included the following:

RESIDENTIAL DEVELOPMENT POLICY	
Main Comments	Consideration
PPS 21 Sustainable Development in the Countryside, and supplementary design guidance should be retained in full, along with PPS 6 Planning, Archaeology and the Built Heritage, particularly with regard to residential heritage.	During the Plan Strategy policy development, Planning Officers took account of current regional planning policy and guidance, including PPS 6 and 21. The Council found the broad thrust and direction of these policies to be generally acceptable and they have been brought forward within the Plan Strategy, in particular Strategic Policies 4:

	<p>Homes, and 7: Historic Environment, and their related Detailed Policies.</p> <p>The Council will continue to take account of existing supplementary design guidance (such as Building on Tradition, and Conservation Area guidance), and any supplementary guidance brought forward by the Council in due course.</p>
<p>PPS 7 Quality Residential Environments should be reviewed to include guidance on residential terraced streets and mixed use high streets.</p> <p>Policy should take account of 'Secured by Design' a Police initiative that guides housing specification, design and building - to deter anti-social behaviour.</p>	<p>The Council will continue to take account of existing supplementary design guidance (such as Creating Places – Achieving Quality in Residential Developments, and Conservation Area guidance), along with any supplementary guidance brought forward by the Council in due course.</p>
<p>Policy should deliver 60% of housing on brownfield sites in line with the RDS target.</p>	<p>The Council notes the RDS target for brownfield sites within urban footprints of settlements of greater than 5,000 population. The Council therefore takes account of this in the Plan Strategy Spatial Growth Strategy. It clarifies that proposals that re-use or make better use of vacant, derelict or under-used brownfield land, or buildings will be supported where they are in accordance with the relevant policies of the LDP.</p>
<p>Policy should, at the very least, replicate the wording of the SPPS, PPS 21 and PPS 7 and its associated Addenda.</p>	<p>During the Plan Strategy policy development, Planning Officers took account of current regional policy documents, including the SPPS as well as current PPS 7, and 21. The Council found the broad thrust and direction of these to be generally acceptable and they have been taken account of in the Strategic and Detailed Policies set out in the Plan Strategy.</p>
<p>Policy should be included in order to facilitate housing for those with disability needs who wish to own their own home.</p> <p>Policy should take account of 'Lifetime Homes Standard' – ensuring the provision of</p>	<p>It is a Strategic Objective of the Plan Strategy to ensure provision of a diverse choice of housing. This Objective will be realised through the application of Strategic Policies 4: Homes, and 6: Placemaking and Good Design, and</p>

<p>housing suitable to meet challenging needs of population especially elderly.</p>	<p>their related Detailed Policies. These policies clarify that the Council seeks to ensure that new housing is designed to meet the changing needs of residents over their lifetimes.</p>
<p>Infill developments are ruining the look of the countryside and creating a suburban environment. Large houses look out of place in rural locations.</p> <p>However, another opinion was that there should be provision to allow infill and cluster housing in the countryside, similar to PPS 21. It should allow for small growth around existing clusters, but not limited to infill.</p>	<p>The Council recognises these differing opinions and is committed to balancing the need for sustainable residential development in the countryside in order to sustain rural communities, against the protection and enhancement of the character and value of the countryside. There may be instances where a well-designed infill opportunity will be acceptable and in line with planning policy and other material considerations.</p> <p>The Council will also support carefully considered infilling or rounding-off of a suitable cluster with a dwelling, subject to the criteria identified in the LDP.</p> <p>In addition, a number of clusters have been identified as new hamlets where consideration will be given to rounding off, and so on when determining the settlement limits at Local Policies Plan stage.</p> <p>Strategic Policy 4: Homes, and related Detailed Policies, clarifies these instances. In addition, Strategic Policy 6: Placemaking and Good Design sets out the requirements for new build housing in the countryside.</p>
<p>The POP fails to have regard to the housing approach within the SPPS with regards to 'plan, monitor and manage'.</p> <p>The spirit of PPS 12 should be brought forward, in terms of having a long term land reserve.</p>	<p>It is a statutory requirement for the Council to monitor how the Plan Vision and Strategic Objectives of the LDP are being achieved on an annual and five-yearly basis. This will include monitoring of the uptake of housing land and the need to ensure that there is a five-year supply as set out in the SPPS.</p> <p>This will ensure that the LDP is kept up-to-date and reflects and responds to emerging issues. The LDP will be flexible and responsive to change. This practice eliminates the requirement to allocate</p>

	<p>large land reserves at the outset of a development plan, as was the practice before this change of approach was introduced in the Regional Development Strategy (RDS), 2001 and continued in the 2012 publication.</p> <p>Further information on monitoring is included at Appendix C of the Plan Strategy.</p>
Request that the Council brings forward a policy to deliver social and affordable housing where a percentage of development should include an element of such housing.	The Council recognises the various housing needs throughout the Borough, including social/affordable housing requirements. As such, the Council has included a new housing policy to ensure that new development will have a percentage of social and affordable housing provided for. This policy is clarified within Strategic Policy 4: Homes, and related Detailed Policies.
There is a call for better bus connectivity to new residential developments.	It is a Strategic Objective of the Plan Strategy to improve accessibility, connectivity, sustainability and ease of movement to, from, and within the Borough. The Plan Strategy's Spatial Growth Strategy is based upon existing commitments and where new opportunities arise, the LDP will require accessibility by public transport to be considered along with the promotion of walking and cycling opportunities.
Furthering on from POP Overarching Primary Principle 7 – Community Benefits (POP, p.100), which states that developers will be expected to meet the costs of infrastructure and other works requires, there was a strong recommendation for the introduction of a developer contributions policy, which can provide affordable housing.	<p>The Council seeks to deliver positive development in the Borough and as such, any necessary works required to facilitate a development proposal may be sought through developer contributions. These contributions will be secured through a variety of mechanisms, including planning agreements under Section 76 of the Planning Act (Northern Ireland) 2011.</p> <p>Within the Plan Strategy, the Council has clarified its position on developer contributions within Strategic Policy 1: Sustainable Development.</p>

<p>All new housing should be developed to Energy Performance Certificate A Standards and the use of renewable energy within developments.</p>	<p>The Plan Strategy has been prepared in the context of furthering sustainable development, and promotes high quality forms of urban design within the Borough. This is clarified in Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies. These call for proposals to demonstrate how they integrate sustainable energy measures.</p> <p>Further to this, Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies advocate a 'Fabric First' approach for major development proposals, which reduces the need for energy consumption through a number of measures.</p>
<p>Advocate for sustainable housing with good space standards making reference to PPS 7 Quality Residential Environments, and associated Addenda.</p>	<p>The Council recognises that open spaces, whether they be public or private, are intrinsic to well-designed residential environments.</p> <p>Planning Officers undertook a review of current regional planning documents, including PPS 7, and found the broad thrust and direction of these acceptable. Therefore, specifications for public and private have been included within the Plan Strategy, Strategic Policy 4: Homes, and related Detailed Policies.</p> <p>The Council will continue to refer to 'Creating Places – Achieving Quality in Residential Developments' and any supplementary planning guidance It may bring forward in due course.</p>
<p>Suggestion for a bespoke policy for Carnmoney Hill and that BMAP Key Site Requirements for housing zonings be included and retained in the new LDP.</p>	<p>The unique natural heritage and landscape value of Carnmoney Hill is recognised by the Council, along with the legacy BMAP housing zonings, which are located to the west of the hill.</p> <p>In line with Departmental guidance, Planning Officers updated the LDP evidence base and conducted a Landscape Character Assessment. This resulted in Carnmoney Hill being identified as a Strategic Landscape Policy Area within the Plan Strategy.</p>

	<p>Further information can be found in Strategic Policy 8: Natural Heritage, and related Detailed Policies.</p> <p>The Local Policies Plan will identify housing zonings and Key Site Requirements, where appropriate.</p>
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Transport and Accessibility

- 10.4 Transportation and its integration with land-use will play a key role in the Council's new LDP. It can help reduce the impact of climate change, encourage accessibility for all and improve health and wellbeing, as well as addressing social inclusion.
- 10.5 The Council has reviewed existing planning policy and guidance documents relating to transport, including PPS 3 Access Movement and Parking, and PPS 21 Sustainable Development in the Countryside. The Council found the broad thrust and direction of these documents generally acceptable. In the POP, it was asked if there were any factors that the Council should address in the new transport policy and the main comments received during the public consultation included the following:

TRANSPORT AND ACCESSIBILITY POLICY	
Main Comments	Consideration
The POP does not sufficiently or overtly address the integration of land-use and transportation - there is a need to explore strategic transport options maximising integration with land-use.	<p>The Council welcomed this comment and has subsequently reworded the Strategic Objective within the Plan Strategy, and clarified how an integrated approach to transport and land-use can be enabled, within the Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies.</p> <p>The integration issue will also be a consideration in the zoning of lands for development purposes at the Local Policies Plan stage.</p>
The retention of existing operational planning policies relating to roads and transportation - including PPS 3 Access, Movement and Parking, and associated Clarification, PPS 7 Quality Residential Environments, and associated addenda, PPS 13 Transportation and Land Use, PPS 17	During the Plan Strategy policy development, the Council took account of current regional policy and guidance documents. These have been reflected in the Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies. Further information on this can

Control of Outdoor Advertisements and PPS 21 Sustainable Development in the Countryside.	be found within Evidence Paper 10: Transportation, which supplements the Plan Strategy.
Need for the retention of policy relating to Protected Routes as outlined within PPS 3 and associated Clarification. Protected Routes need to remain open and protected from development.	The Council recognises the role and significance of Protected Routes, which contribute significantly to the economic prosperity of the region. The Department for Infrastructure (Roads) brings forward Protected Routes and the Council will ensure any future alterations will be demonstrated within the LDP. Policy has been included within Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies and clarification map.
Need for the LDP to provide improved infrastructure and better facilities for public transport i.e. more bus shelters, increased bus provision in line with PPS 13 and the SPPS.	Whilst the direct provision of infrastructure is beyond the remit of a LDP, the Council can enable appropriate development. These proposals can be enabled and approached in a sustainable and safe manner through the application of Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies.
There is potential for the LDP to deliver sustainable travel with our neighbouring Council's through cross boundary connectivity.	The Council recognises movements on the Borough's transportation networks reach far beyond the Council area. The provision of improved cross boundary connectivity will be considered at the Local Policies Plan where relevant if there is an identified cross boundary opportunity such as linked up walking or cycling routes.
New transport policies should encourage opportunities to carry out planting/landscaping to improve the landscape and visual amenity, address Sustainable Urban Drainage Systems, reduce pollution and noise, and provide habitats and green linkages for pollination and biodiversity throughout the Plan Area.	The Council supports the availability of high quality infrastructure networks that are crucial to securing economic investment, and creating sustainable and attractive places. These matters are related to a wide range of development proposals, not only transportation, and are addressed within a number of Plan Strategy policies including Strategic Policy 3: Transportation and Infrastructure, 6: Placemaking and Good

	Design, and 10: Environmental Resilience and Protection, and their related Detailed Policies.
The Department for Infrastructure has prepared Accessibility Analyses maps for Metropolitan Newtownabbey and Antrim. The Department would expect the Council to use this tool and afford it appropriate weight in the plan process. The maps should be used to focus analysis, examining in greater detail, the accessibility of potential sites to be zoned.	<p>The Council appreciates the provision of this evidence base to give a strategic overview of the accessibility of the Borough's settlements.</p> <p>Moving towards the Local Policies Plan, the accessibility of sites will be one of a number of considerations to determine zoned land.</p>
<p>Policy to ensure that new developments are located and integrated with public transport provision and walking/cycling.</p> <p>Any development that is likely to generate 'significant movement' and that can't be served by adequate public transport provision should be refused under policy.</p>	As mentioned above, any area of growth proposed within the Plan Strategy has been subject to an accessibility analysis. Moving towards the Local Policies Plan stage, this practice will continue and the Council will assess each potential zoning for growth for accessibility to the road network, public transport, walking, and cycling routes.
Introduce policy for the protection of disused transport corridors to ensure future public access. Sympathetic reuse of disused railway lines as greenways is welcomed.	The Council welcomed this suggestion, which is in line with current regional policy direction. It has subsequently included policy within the Plan Strategy to safeguard disused transport routes, where there is a reasonable prospect of reuse for future transport purposes. Further clarification can be found in Strategic Policy 3: Transportation and Infrastructure, related Detailed Policies, and within Evidence Paper 10: Transportation, which supplements the Plan Strategy.
The expected growth in electric vehicles should be factored into transport policy. Policies should consider reserving road space for the charging of electric vehicles across the towns in the Borough, including residential streets.	The Council acknowledges the rapid growth in plug-in type vehicles and it will encourage the enabling of associated infrastructure. The policy to facilitate this has been included in Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies.
A financial development contribution towards the costs of transportation	The Council recognises the merits of developer contributions and on

<p>infrastructure outside the direct realms of the development site is worthy of consideration, e.g. for road schemes, pedestrian/cycling paths or traffic management proposals that offer benefit for the 'greater transportation good' of the particular town.</p>	<p>considering evidence, the Plan Strategy will seek these where required and necessary to deliver requirements for development. This will be enabled through the Strategic Policy 1: Sustainable Development and related Detailed Policies. In order to provide clarity for developers, the Council will publish supplementary guidance in due course.</p>
<p>There was much support for a train link to Belfast International Airport. Further to this, there is a call to construct strategic links between Derry/Londonderry - Belfast regional rail network and Belfast International Airport (BIA), specifically constructing a spur rail link from Antrim Station and from Templepatrick to the airport. This would connect Belfast and Derry/Londonderry to BIA.</p> <p>Expanding the rail facility at Mossley West does not appear realistic, as the line has limited capacity for expansion.</p> <p>The rail line running through the Borough begs to be further developed, with reopening of former stations.</p>	<p>The direct provision of rail infrastructure and services is beyond the remit of a LDP. Where appropriate, the LDP will identify land that needs to be protected for future proposals relating to future railway infrastructure.</p>
<p>Recommendation that the provision of car parking at Belfast International Airport is addressed in new operational planning policy.</p>	<p>The Council recognises the pressures to provide car parking at BIA. Subsequently, we have included policy for the provision of public, private and temporary car parking within the Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies.</p>
<p>Crumlin has a lack of public transport. It would especially benefit from a train link and a Park and Ride facility.</p>	<p>Whilst the provision of public transport infrastructure and services is beyond the remit of a LDP, the Council is supportive of this sustainable form of transportation. As such, it will work with key partners to sustainably enable this infrastructure where possible, using Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies to enable development. Where appropriate,</p>

	related site-specific designations will be identified in the Local Policies Plan.
Better bus connectivity to new residential developments.	It is a Strategic Objective (SO 6) of the Plan Strategy to improve accessibility, connectivity, sustainability and ease of movement to, from, and within the Borough. To enable this Strategic Objective, any forthcoming housing lands considered during the preparation of the Local Policies Plan will be examined to assess their links to public transport.
Present park and ride facilities are too small.	The Council recognises the popularity and sustainable value of these facilities, and whilst it is outside the remit of a LDP to provide this infrastructure, the Plan Strategy can enable such development. Applicable policy is contained within the Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies. Where appropriate, site-specific designations will be identified in the Local Policies Plan.
Proposed Greenways should be mapped but need to be realistic. Strong belief that greenways should have featured in POP, blue infrastructure should also have been addressed in tandem.	<p>The Council recognises the importance of greenways, for the provision of sustainable transportation routes, along with health and wellbeing, and biodiversity benefits. This has been reflected in Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies. Where applicable the Council will enable this infrastructure, and provide clarification maps at Local Policies Plan stage where appropriate.</p> <p>The Council further recognises the contribution that blue infrastructure can offer and where feasible, connectivity between proposals and these assets should be explored.</p> <p>Further clarification is included within Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies.</p>

<p>A number of respondents raised issues with traffic congestion and the lack of public transport particularly in the area of Templepatrick. Suggestion for public transport hubs and extension to bus services. It was also highlighted that Doagh is subject to heavy traffic congestion.</p>	<p>Whilst traffic management and public transport infrastructure and service provision is beyond the remit of a LDP, the Plan Strategy can enable such development. Applicable policy is contained within the Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies. Where appropriate, related site-specific designations will be identified in the Local Policies Plan.</p> <p>It is a priority for the Council that central government brings forward necessary infrastructure improvements at the earliest opportunity.</p>
<p>The needs of disabled and less mobile users should be fully incorporated to ensure all ability access.</p>	<p>The Council welcomed this comment. It has subsequently addressed this in Strategic Objective 6, Strategic Policy 3: Transportation and Infrastructure, Strategic Policy 6: Placemaking and Good Design, and their related Detailed Policies. This is in line with current regional policy and the Council's Community Plan. Proposals will be required to demonstrate how they considered the needs of users with impaired mobility.</p>

Open Space and Recreation

- 10.6 Open space is currently defined in planning policy as all open space of public value, including not just land, but also inland bodies of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and outdoor recreation, and can also act as a visual amenity.
- 10.7 The POP clarified that as part of the policy development, the Council reviewed planning policy and guidance in a number of documents, including PPS 8 Open Space, Sport and Recreation. The Council found the broad thrust and direction of these documents generally acceptable.
- 10.8 The POP asked stakeholders if there were any factors the Council should take into account in the new policy for open space. It also asked for suggested areas of open space that should be identified in the Local Policies Plan. Main comments received during the POP public consultation on these matters are as follows:

OPEN SPACE AND RECREATION POLICY	
Main Comments	Consideration
Strong argument for an exception clause similar to Policy OS 1 of PPS 8 Open Space, Sport and Outdoor Recreation to be included.	The Council welcomed this comment, which is in line with current regional policy. It was therefore considered appropriate to include an exception clause within the Plan Strategy, Strategic Policy 5: Community Infrastructure and related Detailed Policies.
<p>Proposals should be required to include a detailed landscape strategy to demonstrate if open space provision is adequate, well designed and integrated.</p> <p>Suggestion that new developments should promote biodiversity through open space with green corridors, planting of native species in housing developments should also be encouraged, including the promotion of tree lined streets.</p>	<p>The Council recognises that quality open space is often a key element of a successful proposal, and used effectively can significantly enhance biodiversity and help integrate new development into the environment. Subsequently, the Plan Strategy clarifies that all development proposals within settlements will be required to demonstrate a number of matters, including how the proposal respects important biodiversity features of the site and its vicinity. Similar specifications are required for proposals in the countryside. Further detail is contained in the Plan Strategy Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies.</p> <p>In line with the Council's Leisure Strategy, the LDP will seek to enable a network of green spaces, which provide both environmental benefits and opportunities for social interaction in the community. This is reflected in the Strategic Policy 4: Homes, and Strategic Policy 5: Community Infrastructure, and their respective Detailed Policies.</p> <p>The Council will continue to take account of 'Creating Places – Achieving Quality in Residential Developments', until it publishes supplementary planning guidance.</p>
Strong support for the protection of open space, however notes there are circumstances where the selective	Whilst the LDP endeavours to safeguard open space, the Plan Strategy policy

<p>redevelopment of portions of open space within large estates can deliver positive effects in term of estate restructuring and reductions in anti-social behaviour, etc.</p>	<p>allows for flexibility and exceptions in certain circumstances.</p> <p>Further information is in Strategic Policy 5: Community Infrastructure, and related Detailed Policies.</p>
<p>Potential for a policy to link/connect new housing developments to attractive, usable, public pocket park spaces through Section 106 type agreements.</p>	<p>Planning obligations (known as Section 76 Agreements in Northern Ireland), and the merits they can secure for the wider community have been considered as a mechanism related to developer contributions. The Council has agreed to seek developer contributions and has included this matter in Strategic Policy 1: Sustainable Development.</p>
<p>With regards to indoor/outdoor sports, the existing policy of SPPS and PPS 8 should be adopted; ensuring sustainable patterns of development are maintained and promoted.</p>	<p>The Council welcomed these suggestions. The Plan Strategy endorses the direction of current regional policy with regard to sporting facilities. This is reflected in the Plan Strategy Strategic Policy 5: Community Infrastructure, and related Detailed Policies.</p> <p>The Council is committed to the protection and enhancement of the Borough's natural environment. Therefore, planning policy to ensure proposed development, including sporting facilities are fulfilling this requirement is provided in Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies.</p>
<p>Draw on Borough's historic environment assets, particularly those that are in public ownership (State Care) and accessible, as areas of open space and as foci for identification and designation of further open spaces.</p>	<p>The Borough contains a rich and wide range of historic assets. It is a Strategic Objective (SO 7) of the LDP to ensure that new high quality development integrates with, respects and enhances these assets. This is reflected in the following Plan Strategy policies: Strategic Policy 2: Employment (which includes Tourism); Strategic Policy 5: Community Infrastructure (which includes Open Space); Strategic Policy 6: Placemaking and Good Design; and Strategic Policy 7: Historic Environment; and their respective Detailed Policies.</p>

Sympathetic reuse of disused railway lines as greenways is welcomed.	Development of this kind can be enabled through the application of Plan Strategy Strategic Policies 3: Transportation and Infrastructure, and 5: Community Infrastructure, and their related Detailed Policies.
Social policies in relation to Open Space, Recreation and Leisure should adhere to principles of Sustainable Water - A Long Term Water Strategy - in particular, the use of Sustainable Drainage Systems (SuDS) should be promoted to deal with surface water.	It is a Strategic Objective (SO 13) of the Plan Strategy to tackle flood risk, which clarifies that this is enabled by making space for water, and utilising sustainable urban drainage systems. Further detail can be found throughout the Plan Strategy, with specific detail contained within Evidence Paper 14: Flooding, which supplements the Plan Strategy.
Outdoor sport amenities, such as skating, cycling or parkour facilities would be beneficial, especially for older teens.	The provision of these facilities is beyond the remit of a LDP, however, the Council can enable appropriate development through the Plan Strategy. Further clarification is in Strategic Policy 5: Community Infrastructure, Strategic Policy 6: Placemaking and Good Design, and their respective Detailed Policies.
We don't always need man-made parks, wild places are hugely important and are diminishing rapidly.	The Council acknowledges the merits of a mix of open space categories. The planning policy within the Plan Strategy is sufficiently flexible to enable the development of a wide range of proposals.
Calls for open space in Doagh, for additional open space in Templepatrick, and for Steeple Park to remain as open space.	The Council welcomes these suggestions. Site-specific designations will be brought forward within the Local Policies Plan.
We would seek acknowledgement that Council are not the only provider of open space given the third sector including voluntary and social economy organisations are playing an increasing role in provision within their communities.	The Council acknowledges that many of the Borough's open spaces and recreation assets are provided by a wide and varying range of parties, and often these facilities are at the heart of communities. The Council is committed to working with providers to secure projects that will benefit the health and wellbeing of the Borough's citizens. The

	LDP can protect and enable the appropriate development of these facilities through the application of the Plan Strategy planning policies, in particular Strategic Policy 5: Community Infrastructure, and related Detailed Policies.
The needs of disabled and less mobile users should be fully incorporated into any new open space policy to ensure all ability access.	The Council welcomed this representation. It recognises that adequate access to community facilities (including open space and sporting provisions) are key components of health and wellbeing for the Borough's residents and visitors. Planning Officers have subsequently addressed this in Strategic Objective 6, Strategic Policy 5: Community Infrastructure, Strategic Policy 6: Placemaking and Good Design, and their related Detailed Policies. This is in line with current regional policy and the Council's Community Plan. Proposals for community facilities (including open space and sporting provisions) will be required to demonstrate how they considered the needs of users with impaired mobility.

Community Development and Facilities

- 10.9 Community facilities can be defined as those undertakings that provide necessary services for the wellbeing of society, including educational facilities, libraries, health and social services, cultural facilities and arts infrastructure.
- 10.10 The POP clarified that the role of the LDP, in relation to community development and facilities, will be to promote and encourage a centre first approach through a sequential test and to ensure any land identified by key providers is protected in the Council's new LDP.
- 10.11 The Council found the broad thrust and direction of extant planning policy and guidance to be generally acceptable. The main comments received in relation to community development and facilities during the POP public consultation are as follows:

COMMUNITY DEVELOPMENT AND FACILITIES POLICY	
Main Comments	Consideration
Suggestion for a policy for Community Facilities. This policy should incorporate a degree of flexibility to allow for existing vacant or underused properties to provide a community facility through a change of use. Reference should be made to 'The Protocol for the Care of the Government Historic Estate'.	<p>The Council welcomed this suggestion and, in line with current regional policy, included this topic within the Plan Strategy Strategic Policy 5: Community Infrastructure, and related Detailed Policies.</p> <p>The Council also welcomed the sustainable use and reuse of the Borough's built environment. This can be enabled through the policies contained in the Plan Strategy, with particular reference to Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies. The Council acknowledges its key role in the stewardship of the historic environment.</p>
Policy should ensure that community facilities are completely integrated into mixed-use development, integral with housing.	The Council appreciates that these facilities often become the heart of the community, in all types of development, not just mixed-use. Their integration and the ease of which the surrounding population can access them are vital to their role and success. Therefore, the Council supports the provision of appropriately located community facilities, which can be enabled through the application of Strategic Policy 5: Community Infrastructure, and related Detailed Policies.
Policies should steer community facilities development away from environmentally sensitive areas.	The LDP will designate the full range of the Borough's natural heritage assets that are worthy of protection from development proposals, not only those relating to community facilities. This will be enabled through the provisions of Strategic Policy 5: Community Infrastructure, Strategic Policy 8: Natural Heritage, and their related Detailed Policies. Site-specific designations will be detailed within the Local Policies Plan.

Identification of a cross boundary policy issue in terms of Cemeteries and Crematoria provisions.	A LDP cannot determine who will utilise community facilities, including cemeteries and crematoriums. The demand of these facilities will be determined by a number of wider factors, and the Council recognises service provision is often a cross boundary consideration. Where there is an identified need to secure land for cemetery or crematorium provision, this may be identified within the Local Policies Plan stage.
Suggestion that retail policy should encourage and facilitate cultural, community, retail, leisure and entertainment facilities.	Current regional planning policy includes community facilities as a town centre use, and the Council takes this approach in the Plan Strategy policy. It recognises that these complimentary functions can make a significant contribution to a town centre's vitality and viability.
Voluntary and social economy businesses also undertake community provision. This should be acknowledged and accommodated within the Plan in future policies and proposals.	The Council acknowledges that many of the Borough's community facilities are provided by a wide range of parties. Often these facilities are at the heart of communities. The LDP can protect and enable the appropriate development of these facilities through the application of Strategic Policy 5: Community Infrastructure, and related Detailed Policies.
The POP sets out a sequential test in effect for community facilities. It is unclear why such an approach is necessary. Community facilities should be located where the community need is. We would question if this approach is consistent with the approach advocated by the SPPS and consider further explanation is necessary to provide for situations with cross over between community and open space and recreation facilities.	<p>The SPPS considers community facilities as a town centre use, and as such, it recommends the application of a sequential approach. However, there is a degree of flexibility in the Plan Strategy policy to ensure these are located where they are easily accessible to the communities that they are intended to serve.</p> <p>Further details can be found within the Strategic Policy 2: Employment, and related Detailed Policies.</p>
Provision of rural community facilities should be enhanced.	The Council recognises the Borough's rural communities, and will support the provision of facilities where they are in line with the policy provisions of the Plan

	Strategy. Further clarification can be found within Strategic Policy 5: Community Infrastructure, and related Detailed Policies.
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Telecommunications and Public Utilities

- 10.12 Public utilities are those undertakings that provide necessary services to society, which include electricity, gas, telecommunications, clean water and wastewater infrastructure. They are important not only because they provide the basic infrastructure for the proper function of society, but also contribute to the economic competitiveness of Northern Ireland. The LDP will have a role in designating any site-specific requirements to support such utilities.
- 10.13 The LDP will also have a role in zoning land needed for airport expansion and to ensure that the provisions of Airport Public Safety Zones are highlighted in the new LDP.
- 10.14 The POP clarified that as part of policy development, the Council reviewed planning policies and guidance relating to telecommunications and utilities, including the relevant provisions of the Planning Strategy for Rural Northern Ireland, PPS 10 Telecommunications, and PPS 11 Planning and Waste Management. The Council found the broad thrust and direction of these documents to be generally acceptable. The POP asked if there were any factors that should be taken into account in a new policy for telecommunications and public utilities. Main comments received during the POP public consultation are as follows:

TELECOMMUNICATIONS AND PUBLIC UTILITIES POLICY	
Main Comments	Consideration
General agreement that current policy provisions contained within PPS 10 Telecommunications is acceptable and should be carried forward into the Plan Strategy.	During policy development, the Council reviewed PPS 10, along with taking account of other current regional policy and guidance documents. This has been reflected in the Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies. Further information is available within Evidence Paper 11: Public Utilities, which supplements the Plan Strategy.
Policy to protect existing strategic transmission infrastructure, as follows: <i>'Planning applications in the vicinity of existing transmission substations and other transmission grid infrastructure must</i>	Planning Officers have worked, and will continue to work with service providers to enable the development of infrastructure to sustain the economic and social development of the Borough.

<i>demonstrate that they are not in conflict with any future development of such infrastructure in the interests of ensuring the consistent and reliable transmission of electricity on Ireland's high-voltage grid.'</i>	This will be enabled through the Plan Strategy Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies. Where applicable, site-specific designations will be identified in the Local Policies Plan.
Policy to prevent any potential impacts on archaeological sites in the renewal of existing infrastructure.	The Council is committed to protect, conserve, and promote archaeological remains within the Borough. Further details are contained within the Plan Strategy Strategic Policy 7: Historic Environment, and related Detailed Policies. This is in line with the direction of current regional planning policy and is applicable to all forms of development, not solely archaeology.
Policies should ensure developments have no adverse impact on environmentally sensitive features and/or locations.	The Council welcomes this approach, which is in line with current regional planning policy. The Plan Strategy includes a Strategic Objective (SO 7) to ensure that high quality new development both integrates, respects, and enhances the Borough's natural and historic environment. Further information can be found in Strategic Policy 8: Natural Heritage, and related Detailed Policies.
There is a need for improved development of telecommunications infrastructure - particularly broadband. Call for the natural gas network and fibre broadband to be extended to all new and existing housing and commercial property.	Whilst the provision of telecommunications and public utility infrastructure is beyond the remit of a LDP, the Council can enable appropriate development through the application of the Plan Strategy Policy 3: Transportation and Infrastructure, and related Detailed Policies.

11 Shaping Our Environment

- 11.1 In the POP public consultation document, this group of policies discussed the options in planning policy approaches to the Natural Environment, Historic Environment, Environmental Protection, and Design. The POP addressed each of these topics in turn, as follows:

Natural Environment

- 11.2 Given its unique location between Lough Neagh and Belfast Lough, the Borough is home to a wide range of rich and diverse natural heritage assets and cultural landscapes. Natural heritage can be defined as habitats, species, landscapes and earth science features, many of which are of such importance that they are designated under International and/or European legislation. Landscape involves the interplay of these elements of the natural and built environment, and their contribution to the special landscapes that are part of the Borough's culture and heritage.
- 11.3 The Council reviewed planning policies and guidance relating to the natural environment and found the broad thrust and direction of these documents to be generally acceptable. The main comments received during the POP public consultation are as follows:

NATURAL ENVIRONMENT POLICY	
Main Comments	Consideration
PPS 2 Natural Heritage should be carried forward, and include international, national and local designations.	The Council welcomed these recommendations. The Council found the broad thrust and direction of PPS 2 to be generally acceptable and appropriate to the Borough. The Plan Strategy policies are contained within Strategic Policy 8: Natural Heritage, and related Detailed Policies, with further information contained within Evidence Paper 17: Natural Heritage, which supplements the Plan Strategy.
Policy to make reference to ecosystem services and their importance to the natural environment. Policy should include a guiding principle, which allows for the avoidance of development that impacts adversely upon natural ecosystems.	Halting the loss of biodiversity and ecosystem services by 2020 is a target set within regional environmental policy, which Planning Officers have taken account of when preparing the Plan Strategy. Strategic Policy 8: Natural Heritage, and related Detailed Policies aim to ensure the continued protection of the Borough's natural heritage, ensuring the correct balance between protection, and the enabling of development, is achieved.
Policy for the proposed Special Countryside Area along Lough Neagh shore.	The Council recognises the natural heritage assets along Lough Neagh and Lough Beg shorelines. In line with Departmental guidance, the Council

	<p>has updated its evidence base. It conducted a Landscape Character Assessment, which determined the location worthy of protection.</p> <p>Further to this, the Council has, and will continue to, participate in the Lough Neagh / Lough Beg Forum to ensure a joined up approach with neighbouring Councils.</p> <p>The Council is committed to ensuring an appropriate balance is achieved between development, and protecting and conserving, and where possible, enhancing the important assets of Lough Neagh and Lough Beg. Therefore, a Strategic Landscape Policy Area has been designated. Development proposals in this location will be subject to the requirements within Strategic Policy 8: Natural Heritage, and related Detailed Policies.</p>
<p>Query as to how natural heritage will be protected through policy.</p> <p>Policy required to protect and enhance the landscape and provision made to support/include green infrastructure.</p>	<p>Through the LDP, the Council will identify and protect the significant natural assets of the Borough, and apply the precautionary principle where the impacts of a proposed development on natural assets is uncertain. The cumulative impacts of development will also be a consideration in the assessment of proposals. Further information can be found in Strategic Policy 8: Natural Heritage, and related Detailed Policies.</p> <p>The Council supports the provision of sustainable modes of transport (such as greenways), along with open space. This is enabled through the application of Strategic Policies, and their related Detailed Policies.</p>
<p>Need for policy relating to Landscape Character Assessment and Landscape Capacity Studies.</p>	<p>In line with Departmental guidance, Planning Officers updated the evidence base and conducted a Landscape Character Assessment. This evidence was considered robust and has informed the Plan Strategy, in particular Strategic</p>

	Policy 8: Natural Heritage, and related Detailed Policies.
Wording within the SPPS with regard to Areas of Outstanding Natural Beauty (AONBs) may pose difficulties for the positioning of transmission grid infrastructure. Consideration should be given to rewording to address this issue.	The Council recognises the importance of transmission grid infrastructure to the quality of life and prosperity of the Borough and the wider region. However, the Council has a responsibility to ensure an appropriate balance is achieved between protecting the Borough's natural assets and enabling sustainable development. Proposals will be supported where they are in line with planning policy contained within the LDP. Strategic Policy 8: Natural Heritage, and related Detailed Policies confirms Areas of Scenic Value, the boundaries of which will be determined in the Local Policies Plan.
The LDP should identify and protect all ancient and long established woodland. This should include a commitment to restore sites that have been degraded with non-native species. It is also important for the LDP to reflect the importance of preserving significant trees, as identified by The Woodland Trust, for the enjoyment of future populations and indeed wildlife.	The Council supports the protection of ancient and long-established woodland through the designation of Local Landscape Policy Areas. These designations are supported through Plan Strategy Strategic Policy 8: Natural Heritage, and related Detailed Policies. The Council will identify detailed boundaries for these designations within the Local Policies Plan.
Need for a consistent policy approach in overseeing cross boundary protection of sensitive landscapes.	The Council has, and will continue to, participate in a number of cross boundary working groups and forums with neighbouring Councils to ensure a consistent approach is delivered, whenever possible. Each Council is also required to take account of the same current regional planning policy, thus ensuring, to some extent, similar LDP policy approaches.
Policy to protect priority habitats and species as identified in the NI Biodiversity Strategy.	In preparing the Plan Strategy, Planning Officers took account of this document and the environmental legislation and designations it has been based on. Subsequently, Strategic Policy 8: Natural Heritage, and related Detailed Policies, ensure the continued protection of these

	natural heritage assets. Where relevant, site-specific designations will be detailed within the Local Policies Plan.
<p>Query with regard to 'Special Areas of Protection'(sic); what does this mean and how will these be managed?</p> <p>Areas should include the Areas of Special Scientific Research (ASSIs), Special Protection Areas (SPAs), RAMSAR designations at Lough Neagh and Lough Beg.</p>	<p>Special Protection Areas (SPAs) are designated under the EU Directive on the Conservation of Wild Birds. The SPAs makes provision for the designation of SPAs and similar EU environmental designations.</p> <p>The Council recognises the value of such international and national environmental designations, and as such, has included planning policy to ensure their continued protection. These policies are within Strategic Policy 8: Natural Heritage, and related Detailed Policies.</p>
<p>Suggestions of landscapes worthy of protection include the entire countryside, Antrim Castle Grounds, Antrim Marina and associated Lough Shore, Rea's Wood, Steeple Park, Crumlin Glen, Newtownabbey Way, Three Mile Water, Monkstown Wood, Six Mile Water, Carnmoney Hill, Tardree Forest, and Castle Upton.</p> <p>There were a number of calls for a Six Mile Valley Regional Park.</p> <p>Local Landscape Policy Area designation at Merville should be brought forward. Braden Glen should be designated as an ancient woodland.</p>	<p>These suggestions have been welcomed by the Council. Whilst a number of these locations are already subject to national and international protection, the Local Policies Plan will designate site-specific areas of protection, for instance Local Landscape Policy areas.</p>
<p>Wildlife protection has been overlooked. Lands zoned in Antrim Area Plan now serve as habitats for wildlife.</p>	<p>During the preparation of the Local Policies Plan, Planning Officers will examine the suitability of uncommitted zoned lands within legacy area plans to determine their appropriate inclusion within the Council's new LDP. The application of Key Site Requirements can help mitigate detrimental impacts of proposed development, or seek to enhance assets within sites.</p>
<p>There should be strong policy protection for areas of natural and semi-natural habitats that lack formal designations - regard should</p>	<p>The diversity of the Borough's habitats, species, landscapes and earth science features is an important and highly</p>

<p>be made not only to landscapes but habitats and species.</p>	<p>valued asset. The Council has therefore included measures within the Plan Strategy to ensure the continued protection of these sites, whether they be international, national, or local features. Proposals will be assessed against Strategic Policy 8: Natural Heritage, and related Detailed Policies. The Local Policies Plan will provide site-specific designations.</p>
<p>The importance of our Landscape, making reference to Belfast Escarpment Area of High Scenic Value (AoHSV) is highlighted. Welcome the reference to Regional Landscape Character Areas but believe landscape types e.g. woodland, river, etc. should be mentioned individually.</p>	<p>The Council recognises the importance of the Borough's natural heritage assets. In line with Departmental guidance, Planning Officers updated the LDP evidence base, and conducted a Landscape Character Assessment. The recommendations of this assessment, have informed the Plan Strategy, and will be used as an initial basis for the preparation of the Local Policies Plan, which will determine site-specific designations, including Local Landscape Policy Areas.</p>
<p>Rural and urban landscape wedges are welcomed.</p> <p>More mapping of the current open spaces, paths, links and access points. Paths into the hills must be marked.</p>	<p>The Council considers it appropriate to include rural landscape wedges where development pressure is apparent and the coalescence of two distinctive settlements may occur. The boundaries of these will be determined at Local Policies Plan stage.</p> <p>The mapping suggestions are welcomed. A number of these assets and access points have been illustrated within the Evidence Papers that supplement the Plan Strategy, and will be further illustrated in the Local Policies Plan.</p>
<p>Urge the Council to promote the Belfast Hills for leisure sport and activities. Welcome the weight given in the POP to the environment and would support the Council to maintain this throughout the LDP.</p>	<p>The Council recognises the Belfast Hill's natural habitats and landscape value. The LDP seeks to ensure there is an appropriate balance between enabling sustainable development proposals and protecting and enhancing the natural environment. In addition, the Council</p>

	<p>also seeks to promote accessibility to open space and nature.</p> <p>Proposals for development, such as sporting facilities, within the countryside and within Landscape Policy Areas, will be assessed against a number of policies within the LDP, in particular Strategic Policy 8: Natural Heritage, and related Detailed Policies.</p>
<p>River valleys flowing down from the hills should receive particular protection (particularly from culverting). Rivers and water quality should be protected and improved through LDP.</p> <p>There was a call to protect river systems within settlements and land with existing permission to be re-zoned in order to protect rivers, which should be an asset.</p>	<p>The Borough's water bodies provide important habitats and landscape features. The Council has provided policy within Strategic Policy 8: Natural Heritage, and related Detailed Policies, that aim to protect and enhance these assets. River corridors will be protected through the designation of Local Landscape Policy Areas within the Local Policies Plan.</p> <p>Certain types of applications will also be subject to Environmental Impact assessment as per The Planning (Environmental Impact Assessment Regulations (NI) 2017 (as amended), to assess their environmental impact.</p> <p>It is not the role of a LDP to revoke planning permissions.</p>
<p>Full protection should be afforded to both designated and non-designated sites important for wildlife and biodiversity.</p>	<p>The LDP provides opportunity to designate international, national, and local environmental designations. The Council has powers to include bespoke designations that are in line with current regional planning policy. These recognise the Borough's natural assets, and include Areas of Scenic Value and Local Landscape Policy Areas. Strategic Policy 8: Natural Heritage, and related Detailed Policies clarify these designations, with site-specific boundaries being determined at Local Policies Plan stage.</p>
<p>Further mention of urban fringe areas needed, this was lacking in the POP. Urban fringe areas should be strategically planned for.</p>	<p>Urban fringes were referred to in relation to Countryside Assessments, under the direction of the Planning Strategy for Rural Northern Ireland, and subsequently</p>

	<p>PPS 21, which was superseded by the SPPS. A role of the Countryside Assessments was to inform an area plan of urban fringe locations that appeared to have a degraded landscape. The area plan would use the results of the Assessment to subsequently provide guidance on how new development could be more appropriately integrated, or where possible, enhance the landscape, and in urban fringe areas, soften the transition between urban and rural areas.</p> <p>In line with Departmental guidance, Planning Officers updated the LDP evidence base and undertook a Countryside Assessment. Further information on this is contained in Evidence Paper 18: Rural Pressure Analysis. The Countryside Assessment examined the Borough in its entirety, including urban fringe areas.</p> <p>The Council is committed to enabling sustainable proposals within the Borough, preserving and, where possible, enhancing the landscape value of any area, whether it be urban or rural, or the urban fringe transitional boundary in between.</p> <p>The results of the Countryside Assessment have been taken into consideration in the Plan Strategy and reflected in its planning policy, particularly Strategic Policies 6: Placemaking and Good Design, and 8: Natural Heritage, and their related Detailed Policies.</p> <p>The Local Policies Plan will spatially reflect the recommendations of the Countryside Assessment, through applying designations and Key Site Requirements where appropriate, to protect and, where possible, enhance the natural assets and landscape value of the Borough.</p>
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Historic Environment

- 11.4 The Borough has a rich built heritage that forms an important part of the character and appearance of its towns, villages, small settlements and countryside. The historic environment can take many forms including tombs, forts, castles and churches, townhouses, farmhouses, grand and vernacular architecture and parklands. It is important to recognise and protect these features within the built environment as they contribute to enhanced quality of life, benefit the economy through their regeneration, and they help to create unique identities and a sense of place.
- 11.5 The Council's POP clarified that the role of the LDP is to ensure that these historic environment assets are protected from inappropriate development and where possible, enhanced. This has been taken forward in the Plan Strategy, with the consideration of zonings within the Local Policies Plan. The POP asked if there were any factors that the Council should take into account in the new historic environment policy, and the main comments received during the POP public consultation are as follows:

HISTORIC ENVIRONMENT POLICY	
Main Comments	Consideration
<p>Request that PPS 6 Planning, Archaeology and the Built Heritage, and associated addendum relating to Areas of Townscape Character, PPS 21 Sustainable Development in the Countryside and its supplementary planning design guidance to be taken forward.</p> <p>The explanatory text within PPS 6 Planning, Archaeology and the Built Heritage is identified as being particularly valuable.</p>	<p>The Council welcomed this comment and on review found the broad thrust and direction of PPS 6 and PPS 21 to be generally acceptable and appropriate to the Borough.</p> <p>The subsequent historic environment policies are contained within Strategic Policy 7: Historic Environment and related Detailed Policies. Amplification text also supports these policies to clarify any additional matters. Further background information is available within Evidence Paper 7: Historic Environment, along with supplementary text in the Plan Strategy itself.</p> <p>Policies in relation to dwellings with historic importance, such as listed or vernacular buildings, is set out in Strategic Policy 4: Homes, and related Detailed Policies. The Council will take account of existing supplementary design guidance (such as Building on Tradition, and Conservation Area guidance) and may bring forward</p>

	<p>further supplementary guidance on due course.</p>
<p>Relevant policy provisions within the SPPS should be retained and clearly articulated within the LDP – particularly those relating to the protection, conservation and enhancement of the historic environment.</p>	<p>The SPPS identifies a number of core planning principles in relation to the historic environment, including it being a key aspect of sustainable development, along with the objective to secure the protection, conservation and where possible, the enhancement of the historic environment.</p> <p>The Council endorses the SPPS objectives and policy direction, and has provided robust Strategic and Detailed Policy within the Plan Strategy to this effect. The policy clarifies how the Council will enable the protection, conservation and, where possible, enhancement, through ensuring adequate protection, the identification of areas with distinct character, and highlighting where archaeological remains are likely to be encountered.</p> <p>Further clarification on this can be found in Strategic Policy 7: Historic Environment and related Detailed Policies, with background information and policy review in Evidence Paper 7: Historic Environment.</p>
<p>The active role and importance of heritage should be recognised.</p>	<p>The Council acknowledges the Borough's wealth of historic assets, and how this environment actively forms an important part of the character and appearance of the Borough's settlements and countryside.</p> <p>This rich environment has the potential to create unique, attractive and welcoming places to live, work and relax in. It also contributes to a sense of place and can have positive impacts on the health and wellbeing of the population, whilst creating significant economic benefits, tackling social deprivation, as well as enhancing the tourism sector.</p> <p>Current regional planning policy directs LDP to recognise this, and the Council</p>

	<p>has responded by including appropriate policies for their protection, conservation and enhancement within Strategic Policy 7: Historic Environment, and related Detailed Policies. The Local Policies Plan will bring forward designations in relation to the historic environment, such as Areas of Townscape Character, and where appropriate, apply Key Site Requirements to zonings.</p>
<p>There should be greater reference to the historic environment's key role with regards to tourism.</p>	<p>The Council acknowledges the important role that historic assets have in the promotion of tourism, and Strategic Policy 7: Historic Environment, and related Detailed Policies provides policy to enable the delivery of the Strategic Objective (SO 5), which aims to support the development of sustainable tourism and enhanced tourism infrastructure.</p> <p>The Plan Strategy recognises how the historic environment can contribute to enhancing the tourism sector through creating a sense of place and the protection, conservation and where possible, enhancement of key assets within the Borough that attract tourists.</p> <p>The policy further ensures that tourism proposals relating to the historic environment are enabled in a sustainable and appropriate manner. This delivers Strategic Objective (SO 7), which aims to ensure that high quality new development integrates with, respects and enhances the Borough's historic environment.</p>
<p>Request that the Council undertake a local listing process as part of an overall heritage audit. This would include scheduling all listed and unlisted heritage, particularly modest collective group heritage (e.g. modest terraced streets).</p> <p>Recommendation to remove permitted development rights on the removal of original painted timber windows/doors and other features etc. both in conservation</p>	<p>The Council acknowledges listed buildings within the Borough and the value they bring. However, the listing process and the removal of permitted development rights is beyond the remit of a LDP.</p>

areas and townscape character. Remain as material considerations in the assessment of applications.	
Recommendation for using the term 'Historic Environment'.	The Council welcomes this recommendation, which has subsequently been reflected throughout the Plan Strategy and supplementary documentation.
Old buildings provide habitats for wildlife - plans for regeneration/refurbishment should incorporate measures to continue to give nature a home.	The Plan Strategy has been prepared in the context of sustainable development and the Council welcomes proposals for the appropriate reuse of the historic environment, and which respect and enhancement of the Borough's natural environment. An example of this is included in Strategic Policy 8: Natural Heritage and related Detailed Policies, which encourages the inclusion of swift nest boxes into the design of buildings.
New policy for Areas of Townscape/Village Character, which should limit the weight given to precedent as a material consideration.	<p>The Council acknowledges the wealth of areas within the Borough that have a unique character and are worth protecting and enhancing where possible. The Plan Strategy includes a bespoke policy for Areas of Townscape Character, the boundaries of which will be defined in the Local Policies Plan.</p> <p>Where a precedent has been set, this will be considered along with other material considerations. The amount of weight to be given to a material consideration is a matter for the decision maker.</p>
The new LDP should inform residents of what built heritage is protected and not protected.	<p>The Plan Strategy sets out the Council's Strategic Objectives for the Borough's historic environment, with Strategic and Detailed Policies that are required to deliver these objectives. For Instance, Strategic Policy 7: Historic Environment, which includes policies for listed buildings and Areas of Townscape Character.</p> <p>The Local Policies Plan will then bring forward site-specific proposals, designations, and land-use zonings. These will clearly define areas of protection and inform the public of any</p>

	measures set out to support appropriate development that has the potential to enhance the historic environment.
Calls for more protection for our built heritage, including its setting.	<p>The Council recognises the Borough's rich historic environment, and the wide range of benefits it brings. Consequently, the Plan Strategy has provided robust policy as set out in Strategic Policy 7: Historic Environment, and related Detailed Policies. These policies aim to promote the continued protection of the Borough's heritage assets, whilst managing change in a positive manner, by supporting development that has the potential to enhance the historic environment.</p> <p>The Council has also undertaken a Landscape Character Assessment for the Borough and a Strategic Settlements Appraisal that has considered this aspect of the Borough's built heritage. These studies will be kept under review and updated further where required at the Local Policies Plan stage.</p> <p>The Local Policies Plan will identify the boundaries of designations relating to the historic environment, such as Local Landscape Policy Areas that seek to protect the setting of the Borough's historic assets. At this stage, suitable Key Site Requirements may also be specified, where appropriate.</p>
Concerns that LDP policy may decrease the level of protection Merville Conservation Area receives. Wish to see replication of PPS 6.	<p>The importance of all three existing Conservation Areas within the Borough is appreciated, and the Council will encourage forms of development that enhance their character and appearance.</p> <p>On reviewing and taking account of current regional planning policy, the Council has included a policy on Conservation Areas within Strategic Policy 7: Historic Environment, and related Detailed Policies. Planning Officers will continue to take account of the existing Departmental</p>

	supplementary design guidance for Conservation Areas.
Growth may present potential adverse impact on historic environment, and for existing historic building stock falling into neglect and decay due to abandonment in favour of new properties. Sites with archaeology should have Key Site Requirements attached.	<p>The Council encourages forms of development that will protect the Borough's special historic features, whilst managing change in a positive manner, by supporting proposals that have the potential to enhance the historic environment.</p> <p>The Council recognises the Borough's rich inheritance of archaeological remains. The Plan Strategy has included a policy specifically for these sites as set out under Strategic Policy 7: Historic Environment, and related Detailed Policies. Boundaries of these designations, and any Key Site Requirements, will be defined at Local Policies Plan stage.</p>
As the provision for community facilities lies with central government, it may be beneficial to refer to ' <i>The Protocol for the Care of the Government Historic Estate</i> ', published by Historic England, 2017. This guidance document may also be useful with respect to approaches to Historic Assets under ownership of the Council.	The Council welcomes the sustainable use and reuse of the Borough's built environment. This can be enabled through the policies contained in the Plan Strategy, with particular reference to Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies. The Council acknowledges its key role in the stewardship of the historic environment and has noted this guidance document.

Environmental Protection

- 11.6 It is important for the Council's LDP to recognise and provide a responsive policy framework related to those areas of activity that could have an adverse impact on the environment. This includes dealing with waste, water supplies and drainage, river engineering and flooding, pollution, air quality and contamination. Noise also has a detrimental impact on the environment in terms of amenity.
- 11.7 Throughout the POP, the need to ensure there are no unacceptable adverse impacts on the environment and amenity as a result of development was an underlying theme. The POP explained that this approach is acceptable and the Council proposed to take it forward in the new planning policy. Main comments

received during the POP public consultation in relation to environmental protection include the following:

ENVIRONMENTAL PROTECTION POLICY	
Main Comments	Consideration
The LDP should continue to ensure that the issue of flooding and flood risk is addressed in all aspects (i.e. fluvial, coastal surface water and water impoundment breach or failure).	<p>The Council recognises the importance of addressing and mitigating flood risk. Subsequently, the Plan Strategy includes a Strategic Objective (SO 13) to that effect, and calls for the utilisation of sustainable urban drainage systems. This Objective will be realised through the implementation of Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies.</p> <p>In addition, the Council will consider the issue of flooding at the Local Policies Plan stage when identifying new land for development.</p>
Anticipated that Local Plan Policies dealing with flood risk will be technically complex. Suggestion made that the policies may require additional justification and amplification to avoid conflicting interpretations.	<p>The Council welcomed this recommendation and has provided initial background information on the LDP approach to flooding within Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies.</p> <p>Further information can be found within Evidence Paper 14: Flooding, which supplements the Plan Strategy. Where appropriate, site-specific information and any Key Site Requirements will be detailed in the Local Policies Plan.</p>
<p>A requirement for Flood Risk Assessment should be included in policy - including when a site is close to the margins of the flood plain as depicted on the strategic flood map. A more accurate definition of the extent of potential flooding is also required.</p> <p>It should ensure that development does not increase flood risk elsewhere and that appropriate construction methods are used (e.g. resistance and resilience).</p>	<p>The Plan Strategy details how the Council will apply a precautionary approach to development in areas that may be subject to flood risk presently or in the future as a result of climate change predictions. Policy relating to this matter is set out within Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies. These policies stipulate that a robust Flood Risk Assessment must accompany planning</p>

Fluvial Floodplains - support an overall presumption against development within river floodplains.	applications in identified flood risk areas. This is in line with the SPPS.
Flood and coastal management should be about protecting and enhancing the natural environment alongside protecting people and property from damaging impacts of floods. Management should aim to identify and deliver on clear environmental, economic and social objectives for catchments or coastline through a range of integrated cost effective solutions.	The Council welcomed these comments. The Plan Strategy includes Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies. The approach of these policies is to apply a presumption in favour of development that will maintain, and where possible, enhance environmental quality, and protects communities from harmful development.
Flood risk strategy - should include a number of key actions regarding the management of flood risk at a regional strategic level and are required to be included within policy at local level.	During the preparation of the Plan Strategy, Planning Officers undertook a review of current regional planning policy and guidance, along with working with key consultees. These documents and discussions have been reflected in Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies. This sets out the approach the Council is taking forward in relation to flooding.
Suggestion that there is a presumption against the development of previously developed land within settlement limits, even if the appropriate current minimum standard of flood defence has been met.	The Council will apply a precautionary approach to development in areas that may be subject to flood risk presently or in the future as a result of climate change predictions. Policy relating to this matter is set out within Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies. At Local Policies Plan stage, sites will be assessed on their individual merits against robust evidence to determine their suitability for zoning.
As outlined in the SPPS, the incorporation of Sustainable Drainage Systems (SuDS) in new developments and retrofits to existing developments should be promoted when assessments indicate that they are required. Support for flood protection methods including new hard engineered or earthen bank flood defences, flood compensation storage works, and land rising.	It is a Strategic Objective (SO 13) of the Plan Strategy to tackle flood risk by making space for water and utilising SuDS. This Objective will be achieved through the application of Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies, which seek to promote the application of SuDS.

	Proposals that further sustainable development through the application of measures to adapt to climate change will be supported where they accord with the LDP and other material considerations.
The 'Profile of Borough' (POP, p.23) should address coastal flood risk, surface water flood risk, and reservoir flood risk.	Flood risk was discussed in the POP 'Profile of the Borough' section on page 25. Further matters relating to flooding have been included within the Plan Strategy Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies. It will be a further consideration on site-specific basis in the Local Policies Plan.
<p>Hard landscaping should be restricted to allow soak away space. Housing should be designed to help minimise flood risk, e.g. sedum roof.</p> <p>The LDP should promote the re-planting of trees on upland areas, adjacent to streams and rivers, to reduced flooding.</p>	<p>The Council recognises that planning has an important role in managing development to help reduce the risk and impact of flooding. The Plan Strategy supports the inclusion of green spaces within new development, including the provision of green roofs, living walls, and the planting of trees. Policy calls for all development to demonstrate the ways in which it is responsive to the threat of climate change.</p> <p>Further information can be found within Strategic Policies 6: Placemaking and Good Design, and 10: Environmental Resilience and Protection, and their related Detailed Policies.</p>
Concern raised with the content of Paragraph 6.78 of the POP, which should ensure that flood risk associated with reservoirs should be addressed by local planning policy in order to comply with the SPPS.	<p>The Plan Strategy clarifies that all proposals within a potential flood inundation area of a controlled reservoir, with the exception of minor development, must be accompanied by a Flood Risk Assessment. This is in accordance with current regional planning policy.</p> <p>Further information can be found in Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies.</p>

<p>Flood Risk Management should be addressed at the highest level in the forthcoming LDP.</p>	<p>As mentioned, the Council recognises that planning has an important role in managing development to help reduce the risk and impact of flooding. The Plan Strategy details how the Council will apply a precautionary approach to development in areas that may be subject to flood risk presently or in the future as a result of climate change predictions. Policy relating to this matter is set within Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies.</p> <p>Flooding will also be considered in the preparation of the Local Policies Plan.</p>
<p>The suggestion to note that if a policy is to be included in relation to development in proximity to reservoirs, a distinction should be made between those reservoirs in public ownership and those in private ownership. Those in public ownership may be more likely to be subject to a regular inspection and maintenance regime.</p> <p>Development in proximity to reservoirs – suggestion that Council's approach could potentially leave a policy vacuum. The policy in SPPS should also apply.</p>	<p>The Council acknowledges this distinction between privately and publicly owned reservoirs, and is supportive of regular inspection and maintenance. However, the soundness of a structure should not be assumed, and the Council will apply a precautionary approach to development in areas that may be subject to flood risk.</p> <p>Policy relating to this matter (ensuring no policy vacuum) is set within Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies.</p>
<p>Belief that policy for proposals in proximity to reservoirs is unduly onerous.</p>	<p>The Plan Strategy policy relating to development in areas that may be subject to flood risk in proximity to reservoirs reflects the approach set out in current regional planning policy. In addition, the Council seeks to promote public safety for the Borough's citizens and visitors.</p>
<p>Impact of drainage on waterlogged archaeological sites should be considered, as should the presence of heritage assets, such as the Toome canal lock, in relation to mitigation measures.</p>	<p>It is a Strategic Objective (SO7) of the Plan Strategy to respect and enhance the Borough's historic environment. This Objective will be realised through Strategic Policy 7: Historic Environment, and related Detailed Policies.</p> <p>This policy requires that development proposals that would adversely affect</p>

	archaeological remains, shall require appropriate measures to be taken and agreed for the identification, where appropriate, and mitigation of the impacts of the development.
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Design

- 11.8 Design is one of the key elements for placemaking and is one of the core planning policies of the Council's new LDP. Good design and positive placemaking is a key component in the delivery of high quality, sustainable places in which people will want to live, work and relax.
- 11.9 The POP highlighted how the LDP will aim to raise the bar in the standard of how new development will look and feel. Design has the potential to contribute greatly to tackling these issues, contributing towards places that people have pride in.
- 11.10 During the analysis of extant operational planning policy, the Council found the broad thrust and direction to be generally acceptable. The POP asked stakeholders if there are any factors that should taken into account, or if there are any areas in the Borough's built environment that should be protected because of their unique or special character. The main comments received during the POP public consultation are as follows:

DESIGN POLICY	
Main Comments	Consideration
Design guidance should be aspirational and non-prescriptive.	<p>The Council recognises the contribution of good design and placemaking in improving the quality of life for the population, in attracting new investment, and furthering sustainable development. The Council has formulated Plan Strategy design policies that are considered appropriate and reflective of the Borough's needs.</p> <p>Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies aim to enhance design characteristics for new development within urban and rural areas, whilst improving the overall amenity quality of the area. This is delivered in a manner that is not overly prescriptive as to stifle creativity.</p>

	The Council will consider the need for supplementary guidance in due course.
A design policy should require proposals to demonstrate that they have used a contextual design taking account of its physical, cultural and social context. Proposals should promote a sense of place.	The Council agrees with this recommendation and has subsequently included wording to this effect in the Plan Strategy Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies.
No relaxation on the present design planning guidance flowing from PPS 21 Sustainable Development in the Countryside.	<p>Within the Plan Strategy, Strategic Policy 6: Placemaking and Good Design includes Detailed Policy for design and the integration of development in the countryside. This reflects current regional planning policy and includes comprehensive criteria to ensure development blends sympathetically with its surroundings.</p> <p>The Council will also take into account Departmental published guidance in relation to design in the countryside and will consider the need for further supplementary guidance in due course.</p>
We recommend that the Borough request and avail of design review advice via an interdisciplinary panel. This can be provided by the Ministerial Advisory Group for the Built Environment (MAG) or Royal Society of Ulster Architects.	<p>In formulating the Plan Strategy design policies, the Council took account of current regional planning policy and guidance relating to design, as well as consulting with relevant key stakeholders. These publications include Conservation Area design guides, Living Places, Building on Tradition, along with Creating Places – Achieving Quality in Residential Development. The Council will continue to apply this supplementary guidance until such times that it produces its own design guide.</p> <p>Further details on this process can be found in Evidence Paper 21: Placemaking and Good Design, which supplements the Plan Strategy.</p>
New developments should be energy efficient and the use of renewable energy adopted to help combat fuel poverty in the LDPs response to address climate change.	It is a Strategic Objective (SO 12) of the Plan Strategy to promote sustainable energy production in order to mitigate and adapt to climate change. This Objective will be realised through the application of Strategic Policy 10:

	<p>Environmental Resilience and Protection, and related Detailed Policies. These include mitigation measures, such as the design of developments to maximise their energy efficiency.</p> <p>Further to this, Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies, clarifies that all development should demonstrate the ways in which it is responsive to the threat of climate change. This should be achieved in the incorporation of renewable energy measures and enhanced energy efficiency measures.</p> <p>It should also be noted that all new applications for housing are subject to Building Regulations, which consider the energy performance and carbon dioxide emission rates of properties.</p>
<p>The POP has no recognition that good design can promote biodiversity and encourage wildlife - this is a step taken backwards in policy formulation for sustainable development and biodiversity.</p> <p>Design should not be solely about the aesthetics of developments but take account of design features from a biodiversity perspective.</p>	<p>The Council welcomed this comment and the LDP as a whole seeks to protect and enhance the Borough's natural environment, including biodiversity.</p> <p>The Plan Strategy recognises that good design adds to the attractiveness of the natural environment and that careful consideration is crucial. This also includes measures in relation to promotion of biodiversity opportunities. Further information is included in Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies.</p>
<p>Policy is needed relating to design concept statements, concept masterplans, and comprehensive planning as well as policy to address regeneration in urban areas.</p>	<p>The Council acknowledges that good design and positive placemaking is a key component in the delivery of high quality, sustainable places in which people will want to live, work and relax.</p> <p>The Plan Strategy includes a bespoke set of design policies for the Borough. It is a requirement of these policies that all medium to largescale development proposals, will be accompanied by a Design Statement. Further information is included in Strategic Policy 6:</p>

	<p>Placemaking and Good Design, and related Detailed Policies.</p> <p>The Council will also consider the need for masterplans in strategic zonings at the Local Policies Plan Stage.</p>
<p>The density of new development must match that within the existing surrounding area.</p>	<p>The Plan Strategy specifies that all new development should seek to enrich and enhance the Borough.</p> <p>Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies, clarify that proposals will be required to make a positive contribution, and relate well to the natural and built environment. This is in terms of a number of features, including its location, size, scale, and density.</p> <p>All proposals within settlements will be required to demonstrate a clear understanding of the characteristics of the site, its wider context and the surrounding area, and demonstrate efficient and effective use of the site.</p> <p>Where appropriate, the Local Policies Plan will apply Key Site Requirements to stipulate suitable densities.</p>
<p>Hard landscaping should be restricted to allow soak away space. Housing should be designed to help minimise flood risk, e.g. sedum roof.</p>	<p>It is a Strategic Objective (SO 13) of the Plan Strategy to tackle flood risk. This Objective will be realised primarily through the application of Strategic Policy 10: Environmental Resilience and Protection, and related Detailed Policies. The approach of these policies is to make space for water.</p> <p>Further to this, Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies clarify that all development should demonstrate the ways in which it is responsive to the threat of climate change. This includes consideration of how a proposal's drainage will be dealt with in a sustainable manner.</p>
<p>Design should consider those who are currently excluded from 'spontaneous</p>	<p>The Council welcomes this comment and has subsequently addressed this in</p>

leisure participation' and show how all ability access has been provided for within new development accessible by the public.	<p>Plan Strategy Strategic Objective 6, which calls for improved accessibility, connectivity, sustainability, and ease of movement to, from, and within the Borough.</p> <p>This Objective will be achieved through various policies within the Plan Strategy. For instance, Strategic Policy 6: Placemaking and Good Design, and related Detailed Policies. Proposals will be required to demonstrate how they considered the needs of users with impaired mobility.</p>
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12 Other Comments

- 12.1 The following section includes comments received that concern issues that are outside the remit of a Local Development Plan (LDP). It also considers comments that were received during the Community Plan public consultation process that may be addressed through the Council's LDP. Finally, it outlines comments received during the Preferred Options Paper (POP) Sustainability Appraisal and Equality Screening.

Non-Local Development Plan Comments

- 12.2 A number of issues were raised during the POP public consultation that cannot be addressed under the remit of a Local Development Plan. These included:

NON LOCAL DEVELOPMENT PLAN COMMENTS
Main Comments
Planning application objections should be anonymous.
Need for improved infrastructure and better public transport facilities, such as bus shelters and increased bus provision. Provision of a rail service to Belfast International Airport and the reopening of former stations within the Borough.
Need for improved telecommunications infrastructure – particularly broadband.
Call for the removal of permitted development rights for listed buildings.
Request for local listing of all built heritage, particularly modest collective group heritage, such as modest terraced streets.

Ban developers from lobbying Council Members.
The importance of our environment, and looking after it, can be encouraged through local groups, and helping existing groups who are working in this area.
Call for third party rights of appeal.
Clarification on the implementing the Review of Old Mineral Permissions (ROMPS).
Is there a way to control the type of shops in town centres? There are too many charity shops and 'pound shops'.
Call for fulltime permanent living wage jobs, not minimum wage, zero hours contracts, or agency work. People need long-term security.

Community Plan Consultation

- 12.3 The Council's draft Community Plan public consultation period ran alongside that of the POP public consultation. The Community Plan consultation received a number of comments that have a relevance to the LDP. These are summarised as follows:

LOCAL DEVELOPMENT PLAN COMMENTS RECEIVED DURING COMMUNITY PLAN CONSULTATIONS	
Main Comments	Consideration
The importance of rural connectivity, and seeks clarification on how this is measured, monitored and improved upon.	<p>The Council recognises the Borough's rural communities and as such has provided Strategic Objective 6 '<i>Improve accessibility, connectivity, sustainability and ease of movement to, from and within the Borough</i>' within the Plan Strategy. This Objective enables the Council's Community Plan Outcome 2 '<i>Our citizens live in connected, safe, clean and vibrant places</i>'. Further clarification on the Plan Strategy approach to rural connectivity can be found in Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies.</p> <p>The Council has worked with, and will continue to work with relevant key consultees to ensure future transport and communications infrastructure</p>

	<p>improvements plans can be facilitated where possible.</p> <p>The Council has ensured that the Plan Strategy policies have been subject to a Rural Needs Assessment, which has been published alongside the Plan Strategy.</p>
Lack of necessary infrastructure to facilitate housing developments.	<p>Whilst the provision of public utilities is outside the remit of a LDP, the Council will work alongside its partners to plan for, and to deliver high quality public utilities and infrastructure.</p> <p>The Council has designed the Plan Strategy with emphasis on the importance of the relationship between the location of development with the necessary supporting services and infrastructure. The availability of public utilities is a prerequisite to facilitating development. The Plan Strategy includes this planning policy within Strategic Policy 3: Transportation and Infrastructure, and related Detailed Policies, with background information found in Evidence Paper 11: Public Utilities, which supplements the Plan Strategy.</p>
Town centres are no longer sustainable locations for retail centres alone and rather a range of activities must be encouraged via forward thinking planning policy.	<p>Current retail trends are recognised by the Council, along with the need to maintain and encourage vitality and viability within the Borough's centres.</p> <p>Further to this, the Council is supportive of the approaches regarding the future of town centres that are contained in current regional planning policy, which permits and protects a diverse range of town centre uses. The Plan Strategy therefore endorses leisure, cultural and community facilities, housing and business uses within the Borough's town centres.</p> <p>For further information see Plan Strategy Strategic Policy 2: Employment, and related Detailed Policies, with background information within Evidence Paper 4: Retail and Commercial Leisure.</p>

<p>The Council should consider environmental aspects including:</p> <ol style="list-style-type: none"> 1. improvements to the existing managed open space; 2. protect, enhance and connect important sites for nature, protect vulnerable species; 3. promote the reuse, reduce and recycle method to waste; 4. access to quality green space; and 5. development should be considered appropriate if it is sympathetic to nature and is built within its environmental limit. 	<p>The Council recognises its responsibility to enable the protection, conservation, and where possible the enhancement and restoration of the Borough's natural environment. The LDP can facilitate this role through the implementation of sound planning policy.</p> <p><u>Open Space</u></p> <p>The Council supports the provision and protection of open space, unless there are exceptional circumstances, as detailed in Strategic Policy 5: Community Infrastructure, and related Detailed Policies. This is in line with current regional planning policy and with the Council's Leisure Strategy, which aims to improve resident's mental and physical health. The Plan Strategy also recognises the environmental benefits of open space, preserving biodiversity and landscapes.</p> <p><u>Natural Heritage Sites</u></p> <p>The Plan Strategy clarifies that the Council is committed to working with stakeholders to ensure that biodiversity and natural heritage is protected, and where possible, enhanced across the Borough. Further clarification on this approach can be found in Strategic Policy 8: Natural Heritage, and related Detailed Policies.</p> <p><u>Sustainable Waste Management</u></p> <p>The Council is committed to ensuring the responsible management of waste and supporting measures to increase recycling within the Borough. In line with the waste hierarchy, the Council, through the LDP, actively supports sustainable waste management through the Council's Waste Management Plan, ensuring adverse impacts are avoided or mitigated. Waste proposals that encourage resource efficiency will be supported.</p> <p><u>Access to Green Space</u></p>
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	<p>The Plan Strategy recognises the link between access to open space and the health and wellbeing of the Borough's residents and visitors. Strategic Objective 10, '<i>Promote the protection and accessibility of open spaces</i>', will be achieved through the application of Strategic Policies, particularly Strategic Policy 8: Natural Heritage, and related Detailed Policies.</p> <p><u><i>Appropriate Design</i></u></p> <p>In line with current regional planning policy, the Plan Strategy supports high quality development and recognises the contribution of good design and positive placemaking in improving the quality of life for the population, and in attracting new investment.</p> <p>Strategic Policies 6: Placemaking and Good Design, and 8: Natural Heritage, and their related Detailed Policies, aim to ensure the responsible use of land and natural resources, developing within environmental limits. They aim to promote biodiversity, conserving and enhancing natural heritage.</p>
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13 Conclusion

- 13.1 The Council is committed to meaningful engagement and recognises that the success of its Local Development Plan (LDP) lies in the application of local knowledge and an appreciation of what is important to the citizens of Antrim and Newtownabbey. The publication of the Council's POP in January 2017 was the first formal stage in discussing key planning issues within the Borough.
- 13.2 The 12-week POP public consultation provided stakeholders with the opportunity to put forward their views, influence the Council's new LDP, and ultimately shape the future of the Borough from the outset.
- 13.3 This POP Public Consultation Report set out a summary of the main issues raised during the POP public consultation period. This Report also demonstrated how these issues have been taken into account during the preparation of the LDP Plan Strategy. This met the requirements of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Part 3, Regulation 11 (4). Where relevant, some POP responses will be considered further at the Local Policies Plan Stage of the Council's LDP.

- 13.4 This Report is published alongside the Plan Strategy and will be submitted to the independent examiner as required under The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Part 5, Regulation 20 (2)(f). The Interim Consultation Report, published in August 2017, has now been superseded by this POP Public Consultation Report.
- 13.5 The Council would conclude that all issues raised in representations during the POP public consultation period have been considered by Planning Officers, and where relevant, by the Council's key partners in the LDP preparation process.
- 13.6 Moving forward, the Council's Corporate Plan defines the Council's values, which includes a commitment to placing the customer at the heart of everything the Council does, and engaging with the public to understand their needs and exceed their expectations. Subsequently, the Council's Statement of Community Involvement, published in January 2016, outlines further public engagement opportunities throughout the remainder of the LDP preparation process, whereby stakeholders can further shape the LDP and the future of the Borough.

Appendices

Appendix 1 – POP Launch Invitation



The graphic is a rectangular invitation card with a light blue background. In the top left corner, there is a stylized map of a town with a red location pin. In the top right corner is the logo for Antrim and Newtownabbey Borough Council, which features a green leaf and a blue wave. The main text is in a large, bold, blue font. Below the main text, there is a line of smaller text in a bold, black font. The central text is in a bold, purple font. Below this, there are three location pins: a green one on the left, an orange one in the middle, and a red one on the right. Each pin is followed by text in a bold, black font. At the bottom, there is a line of text in a bold, purple font. The bottom of the graphic features a grey silhouette of a town skyline with a bridge, trees, and a small airplane flying in the sky.

Please Join Us...

for a photocall followed by a light breakfast

Marking the launch of the Local Development Plan Preferred Options Paper & the Community Plan Consultation Period

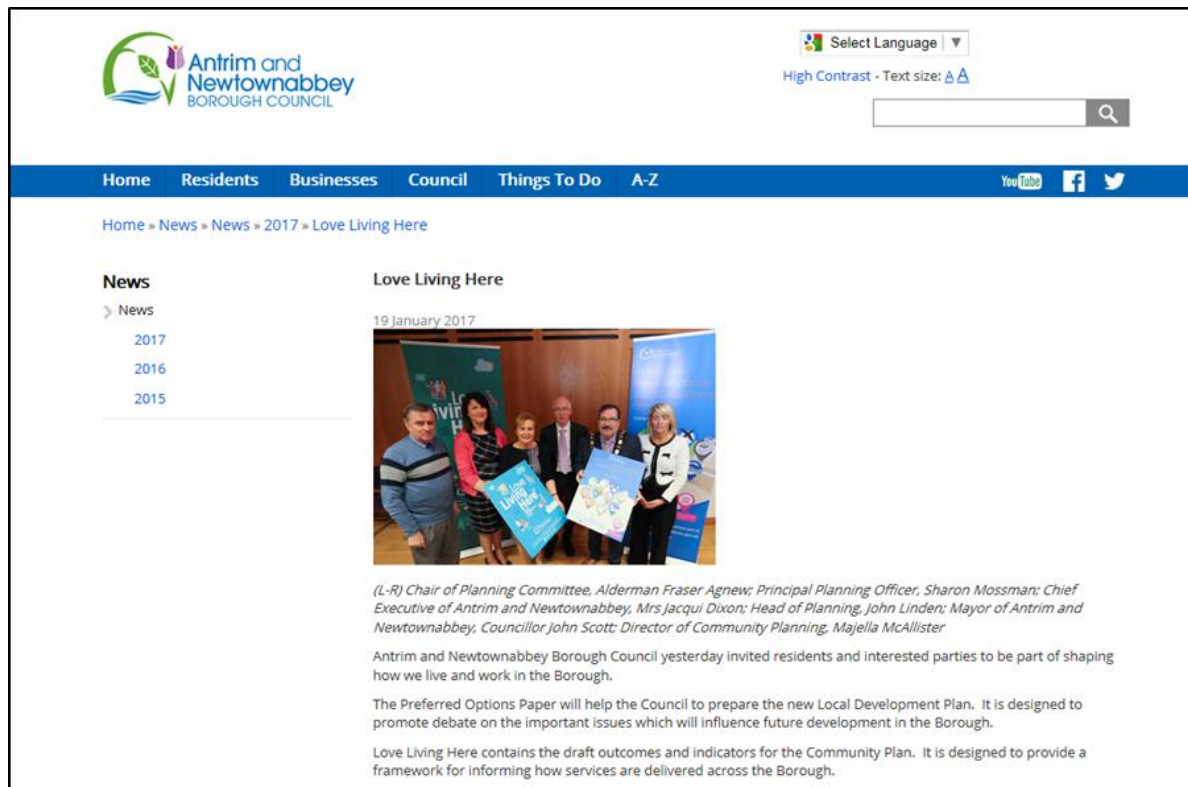
Date: 18 January 2017

Time: 8:30am-9:00am

Location: Mossley Mill,
Carnmoney Road
North, Newtownabbey

RSVP: planning@antrimandnewtownabbey.gov.uk by 11 January 2017

Appendix 2 – Press Release



Screenshot of press release as published on the Council webpage.

The following advertisements were placed in the **Antrim Guardian** and **Newtownabbey Times** during the weeks commencing:

- 16 January 2017
- 23 January 2017
- 13 March 2017
- 20 March 2017
- 27 March 2017
- 03 March 2017



Antrim and Newtownabbey Local Development Plan 2030 Preferred Options Paper

Notice is given that, on 18 January 2017, the Council will launch the Preferred Options Paper (POP) for its emerging Local Development Plan for a 12 week period of public consultation which closes on 12 April 2017.

The POP is a consultation document designed to promote debate in relation to key strategic planning issues arising in the Plan area. Where appropriate, it sets out a range of possible options in respect of these issues and indicates the Council's preferred options together with relevant justification.

The POP is being published along with a number of other key documents which are also subject to a 12 week public consultation. These documents include a Sustainability Appraisal Interim Report incorporating a Strategic Environmental Assessment, an Interim Progress Report on Equality Impact Assessment and an initial screening report in relation to Habitats Regulation Assessment.

In addition a number of background evidence papers are being published for public information including the Council's Housing Monitor Report 2014-2015.

The POP and all relevant supporting documents may be viewed at www.antrimandnewtownabbey.gov.uk/local-development-plan and will also be available for examination between 9am and 5pm (Monday to Friday), in the Council offices at:

Mossley Mill
Carmoney Road North
Newtownabbey, BT36 5QA

Antrim Civic Centre
50 Stiles Way
Antrim, BT41 2UB

Planning Staff will be available at Mossley Mill during normal working hours as part of our public consultation on the POP. Planning Staff are also available at Antrim Civic Centre by appointment by ringing 0300 123 6677. Hard copies of all documents are available upon request subject to charge.

How to Respond

You can respond in a number of ways but we would like to encourage you to submit your views online by visiting our Local Development Plan webpage at www.antrimandnewtownabbey.gov.uk/local-development-plan

If you would like to complete a hard copy questionnaire please contact the Planning Section at Mossley Mill in writing, by telephone on 0300 123 6677, text phone 18001 028 9034 000 or by email to planning@antrimandnewtownabbey.gov.uk.

Planning Drop In Sessions

We are also holding a number of drop in events across the Borough, and invite interested parties to attend and discuss aspects of the Preferred Options Paper with Council Officials. Details of these events are listed below:

Venue	Event Type	Date	Time
Nellsbrook Community Centre	Drop-In	Tuesday 31 January	16:00 – 19:00
Lilian Bland Pavilion	Drop-In	Thursday 2 February	10:00 – 13:00
Valley Leisure Centre	Drop-In	Friday 3 February	13:00 – 16:00
Crumlin Leisure Centre	Drop-In	Tuesday 7 February	12:00 – 15:00
Old Courthouse, Antrim	Drop-In	Thursday 16 February	16:00 – 20:00
Ballyclare Town Hall	Drop-In	Tuesday 21 February	10:00 – 13:00
Mossley Mill	Drop-In	Thursday 23 February	09:00 – 20:00

The Council's draft Community Plan is also being published for public consultation. Planning Officials will also be attending Community Plan events throughout the public consultation period. Full details of the Council's draft Community Plan and events are available on our web page or by contacting 028 9034 0000.



Planning Applications – Airport,
Ballyclare, Glengormley Urban,
Macedon and Three Mile Water DEAs

Antrim and Newtownabbey Local Development Plan 2030

We have published our Preferred Options Paper (POP) and a number of planning documents for a 12 week period of public consultation ending on 12 April 2017. The POP is a consultation document designed to promote debate in relation to the key strategic planning issues arising in the Plan area. We would like your views on the future of our Borough.

To have your say please go to our web site at www.antrimandnewtownabbey.gov.uk or contact at 0300 123 6677 or email at planning@antrimandnewtownabbey.gov.uk

Planning Staff are also available at Mossley Mill during normal working hours or in Antrim Civic Centre (by appointment) to discuss our Preferred Options Paper.

Planning Applications

The Planning Committee meets monthly to consider all non-delegated applications. The Council's Scheme of Delegation is available at: www.antrimandnewtownabbey.gov.uk. Full details of the following applications including plans are available to view via Public Access on the NI Planning Portal www.planningni.gov.uk or at the Council Planning Office. Telephone 0300 123 6677. Text Phone 18001 028 9034 000. Written comments should be submitted within 14 days and should quote the application number. Please note that all representations will be made available on Public Access.

APPLICATION NO	LOCATION	PROPOSAL (In brief)
LA03/2017/0242/O	6 no. detached dwellings and garages	Lands between 72 and 76 Kingsmoss Road, Newtownabbey
LA03/2017/0257/F	Domestic Shed/ Garage (retention)	8 Kingsmoss Road, Newtownabbey
LA03/2017/0258/O	Two storey dwelling and garage (in substitution of approval T/2014/0504/O and relocation of the site)	Site 150m east of 25 Rathmore Road, Dunadry
LA03/2017/0260/O	Dwelling and garage	Site to the rear of 139 Templepatrick Road and adjacent to 141 Templepatrick Road
LA03/2017/0261/F	Ground floor rear extension to dwelling	7 Berry Drive, Newtownabbey
LA03/2017/0262/F	Detached garage with fitness room	2 Farnley Crescent, Newtownabbey
LA03/2017/0265/F	Single storey rear and side extension to dwelling	20 Glenwell Park, Glengormley, Newtownabbey
LA03/2017/0266/F	Two storey side extension to dwelling and conversion of garage to living accommodation	42 Jordantown Road, Newtownabbey
LA03/2017/0267/F	Replacement Porch to rear of dwelling	13 Caim Gardens, Crumlin
LA03/2017/0268/F	Single storey extension to dwelling and garage.	32 Abbey Crescent, Whitehouse, Newtownabbey

Appendix 3 – Borough Life Magazine Extracts



Borough Life
RESIDENTS' MAGAZINE 17 March 2017

GET CONNECTED
We are now on Facebook

LOVE LIVING HERE
Get involved with our Community Plan

TIPS FOR RECYCLING
Love Food Hate Waste

SPRING HAS SPRUNG
Be sure to check out our Easter activities across the Borough

[@ANBorough](#)

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MAYOR'S MESSAGE



Welcome to the March issue of Borough Life, our residents' magazine, that keeps you updated on how the Council is working for you.

We are hoping that you will help shape the future of your Borough. Currently we have two very important consultations underway. One is about the space we live in and what it will look like in the future and the other is about our quality of life and the things that matter to us. I would encourage you to take part in the online consultation on the Preferred Options Paper and Draft Community Plan. See page 21 for more information about these.

I am also pleased to report that once again the Council has worked hard to ensure our residents and businesses are not affected by rising rain costs. This is fantastic news for everyone and you can read about it on page 23.

As we head into spring we have some great events planned. The amazing Garden Show Island is coming back to our award winning Antrim Castle Gardens which is an event that can't be missed! Don't forget to like our new Facebook page to keep up to date with this and other events coming to our Borough.

I wish you and your family a safe and enjoyable Easter.

Councillor John Scott
Mayor of Antrim and Newtownabbey

The magazine is available in alternative formats, please contact us for more information.

The magazine is delivered to postal areas BT28, BT29, BT37, BT38, BT39, BT40 and our residents in BT36. If it is not delivered to any of your neighbours living in these areas, please let us know.

Printed on FSC accredited material.

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If you have any comments on the magazine please contact:
Communications and Customer Services
Antrim and Newtownabbey Borough Council
Antrim Civic Centre, 50 Silver Way, Antrim, BT16 2HL
T: 028 9634 0854
E: communications@antrimnewtownabbey.gov.uk

It's your chance to Have Your Say



LOVE LIVING HERE: HAVE YOUR SAY

We need you to help us shape the future of our Borough. It's your chance to shape it for the future and have your say on new different places. The Preferred Options Paper is about the space we live in and what it will look like in the future.

The other, the Draft Community Plan, is about our quality of life and the things that matter to us. It's called 'Love Living Here'. Many of you have already told us that you do and how the research has also identified some of the key issues our Borough has to face in the future. We have drafted a plan in conjunction with other partner agencies and organisations and we want to hear what you think of this Plan. If you live here, it's time to have your say. We need residents, business owners and service providers to help shape the future of this Borough. It is really important that you, the people who live and work here, comment on these documents and are part of informing how they develop.

The plans are long term and ambitious, they will set out how we can continue to improve quality of life for our citizens through considered development and a focus on wellbeing.

They present an opportunity to shape Antrim and Newtownabbey between now and 2030 so that we truly do Love Living Here.

Both the Preferred Options Paper and Draft Community Plan are now available for public comment.

Full details of the Local Development Plan and Draft Community Plan are available on the Council's website: www.antrimnewtownabbey.gov.uk

For further information on the:
Preferred Options Paper contact Planning T: 028 9634 0677 E: planning@antrimnewtownabbey.gov.uk
Draft Community Plan contact Media Services T: 028 9634 0672 E: communityplanning@antrimnewtownabbey.gov.uk

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Appendix 4 – Display Exhibitions

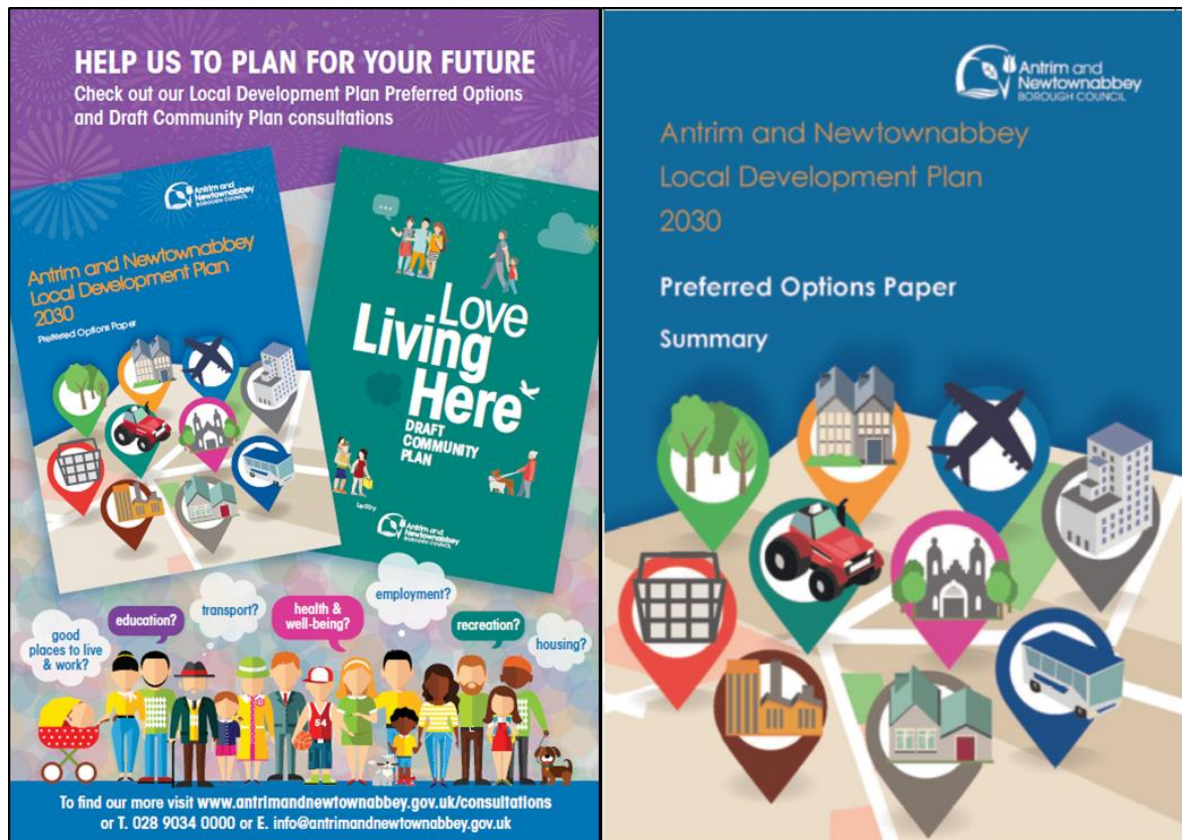


Exhibition at Antrim Civic Centre, in the public reception area.

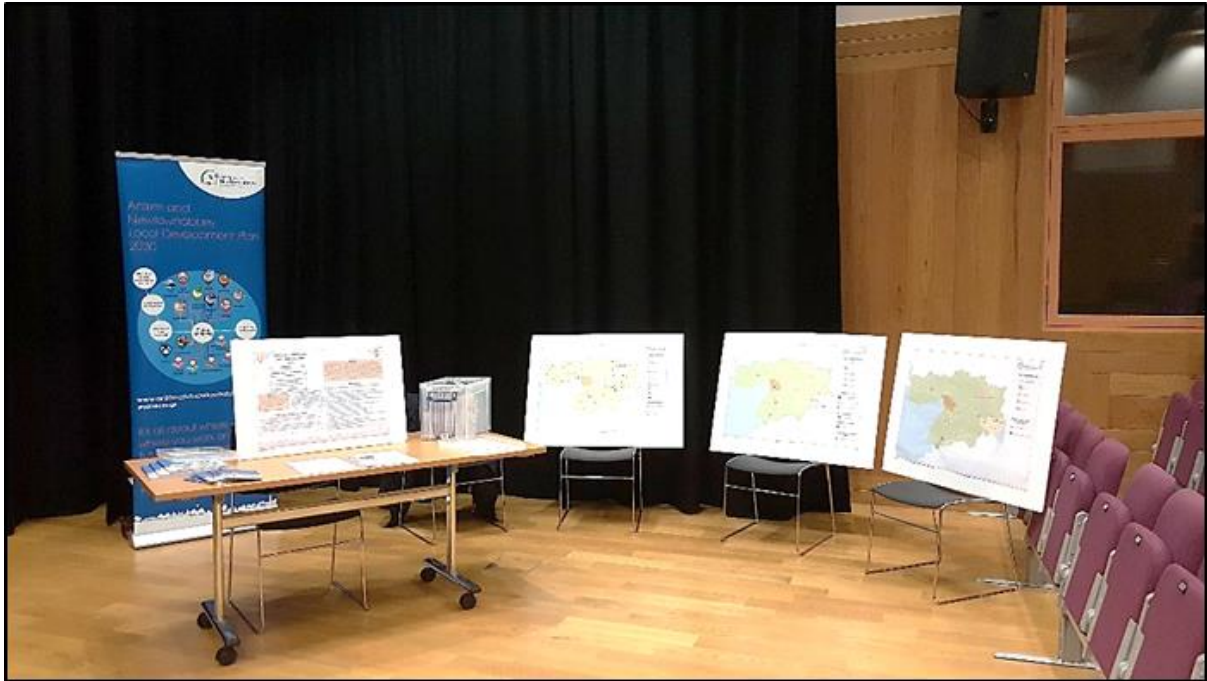


Exhibition at Mossley Mill, in the public reception area.

Appendix 5 – POP Poster and Summary Booklet



Appendix 6 – Public Engagement Event



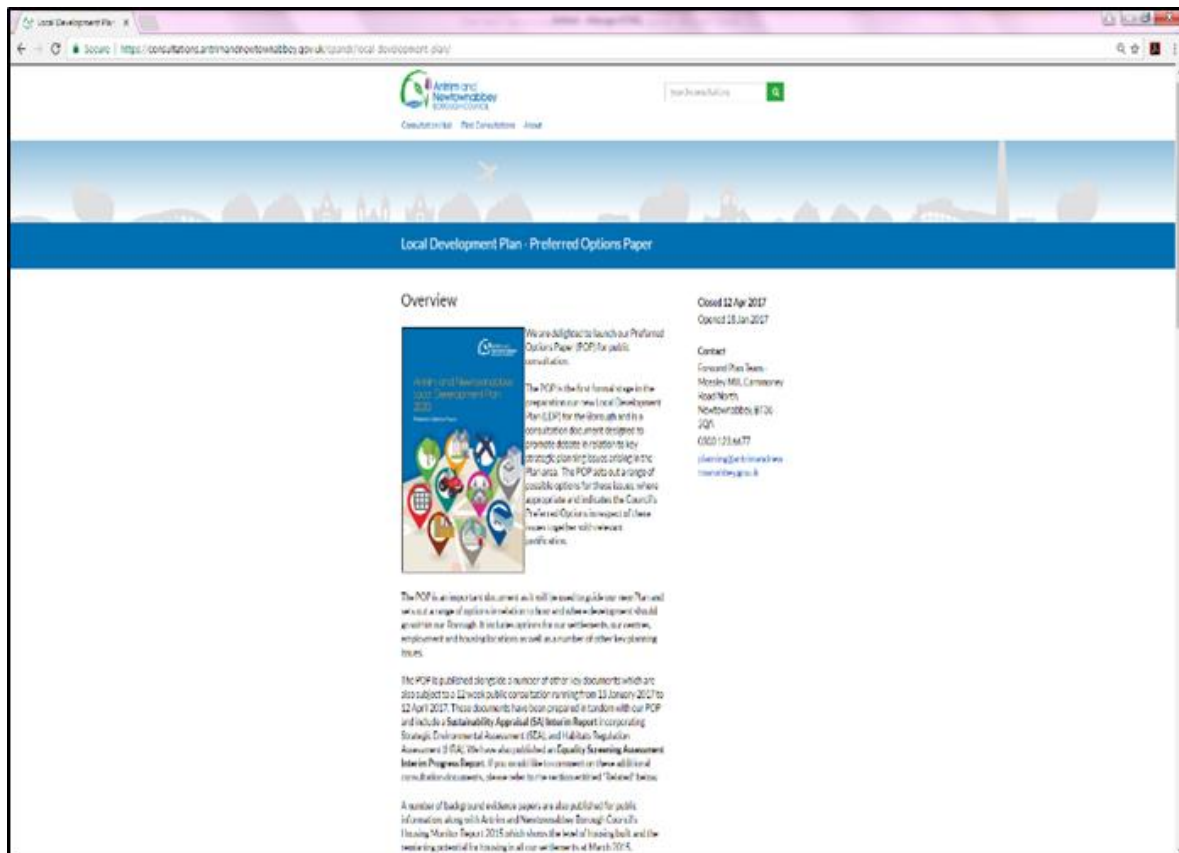
Example set-up at drop-in public engagement event.

Appendix 7 – Social Media



Screenshot of social media posts regarding the POP public consultation

Appendix 8 – Web Based Consultation



Screenshot of online consultation that hosted on the Council's webpage.

Appendix 9 – Statutory Consultations

The following table details the Council communications with statutory consultation bodies regarding the POP launch and public consultation opportunity:

Statutory Consultees	Reply Received	Sub-group if relevant
Government Departments		
The Executive Office	No	N/A
Department of Agriculture, Environment & Rural Affairs	Yes	<ul style="list-style-type: none"> Department of Agriculture, Environment and Rural Affairs
Department for Communities	Yes	<ul style="list-style-type: none"> Historic Environment Division Historic Buildings Council Ministerial Advisory Group
Department of Education	Yes	N/A
Department for the Economy	Yes	<ul style="list-style-type: none"> Department for the Economy Invest NI
Department of Finance	No	N/A
Department for Infrastructure	Yes	<ul style="list-style-type: none"> Planning Transport Planning and Modelling Unit Transport NI Northern Division Water and Drainage Policy Division
Department of Health	No	N/A
Department of Justice	No	N/A
Neighbouring Councils		
Armagh City, Banbridge and Craigavon	Yes	N/A
Belfast City Council	Yes	N/A
Lisburn and Castlereagh	Yes	N/A
Mid and East Antrim	Yes	N/A
Mid Ulster	Yes	N/A
Water and Sewerage Undertaker		
Northern Ireland Water	No	N/A
Northern Ireland Housing Executive		
Northern Ireland Housing Executive	Yes	N/A
The Civil Aviation Authority		
The Civil Aviation Authority	No	N/A

Person(s) to whom the electronic communications code applies by virtue of a direction given under Section 106(3) of the Communications Act 2003		
A list of 17 persons supplied by Offcom	No	N/A
Person(s) to whom a licence has been granted under Article 10(1) of the Electricity (Northern Ireland) Order 1992		
List of 81 persons compiled by LDP team using the utility regulator register	Yes	<ul style="list-style-type: none"> • Gaelectric Developments Limited (representing 7 windfarms) • Lightsource (representing 2 windfarms) • Ora More Energy Limited • ESB – Northern Ireland Electricity Networks • SONI Ltd
Person(s) to whom a licence has been granted under Article 8 of the Gas (Northern Ireland) Order 1996		
List of 24 persons compiled by LDP team using the utility regulator register	No	N/A

Section 75 List

Section 75 Groups	Number of Replies Received	Sub-group if relevant
A list of 331 Section 75 Group supplied by Council's Communications and Customer Services Team	No	N/A



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