

Local Development Plan 2032

**Preferred Options Paper
Consultation Report**

April 2025



**Ards and
North Down**
Borough Council

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Executive Summary

Ards and North Down Borough Council is preparing a new Local Development Plan (LDP) to guide development of the Borough up to 2032. The LDP will set out a vision for how the Council area should look in the future. It will also set out the policies and proposals for the use, development and protection of land across Ards and North Down. The LDP will be the primary consideration for the development management process and decision making for planning applications. The LDP policies and proposals will reflect the priorities and vision for the Borough, the aspirations of the Community Plan, 'The Big Plan' and the regional requirement to deliver sustainable development.

The Preferred Options Paper (POP) is the first stage in the preparation of the LDP. Ards and North Down presented its (POP) for public consultation in March 2019. The purpose of the POP is to stimulate public comment and help interested parties to become involved in a more meaningful way at this earliest stage of plan preparation.

The Preferred Options Paper (POP) includes a Borough Profile, containing a range of information about the Borough's demography and provided the basis for consulting on a series of 42 options for dealing with key issues in the plan area. It outlined the vision, objectives and key planning issues affecting the Borough. The POP key issues are informed by a suite of position papers which form part of the evidence base for the LDP, these were published alongside the POP.

This Consultation report details the consultation process undertaken for the POP. The executive summary provides a summary of the feedback received on the POP introduction, including, the strategic aims and vision, the chapters and the topics within them. The body of this report provides detail for each Key Issue, preferred option and each question posed in the POP. There is an indication of the support for the preferred option, a summary of the representations received

from the public, and a summary of responses from consultees, concluding with the initial consideration and way forward.

Borough Profile, Vision, Objectives

72% of the public agreed with the Plan Vision, respondents wished, however, to see more ambitious growth for the Borough over the plan period. Some respondents wished to see more emphasis on sustainable transport, the climate emergency, air quality, increased use of brownfield land (particularly in town centres), solutions for social, affordable houses and specific housing for the ageing population in the Borough. DFI Planning welcomed the alignment of the POP with the five Core Planning Principles of the SPPS. Northern Ireland Housing Executive (NIHE) stated its support for the strategic objectives, in particular for the social objective to provide sufficient supply of housing land for new housing to meet housing needs. DFI expressed the view that it wished to see the approach to development within small towns, for example, Holywood, Donaghadee and Comber, i.e. those which are neither large towns nor rural.

Key Issue 1 Developer Contributions

There was support in the comments expressed by some respondents, for developer contributions, however, 50% of the public respondents disagreed with the preferred option. Concern was expressed regarding possible consequential impact on housing prices, viability and the attractiveness of the Borough for investment. Consultees expressed support for the aim of developer contributions overall, however, some raised concerns regarding the application of developer contributions in practice. DFI advised that there is not a legislative provision in NI for any type of non-negotiable levy on development similar to the Community Infrastructure Levy in England and Wales. Northern Ireland Water (NIW) stated that it cannot accept financial contributions from developers to build additional wastewater treatment facilities for proposed new development, and that any proposed new development that requires additional treatment facilities, would need to be built and paid for by the developer.

Key Issues 2 Settlement Hierarchy

Over 65% of responses support a review of the settlement hierarchy. There were also nearly 60% who supported the indicative hierarchy shown in the POP. The Hierarchy contained four tiers: large town, small town, village and small settlement. Both Portaferry and Ballygowan were illustrated within the small-town tier. Ardkeen and Ballywhiskin were shown as new small settlements. Statutory consultees were supportive of the approach stating that the Spatial Growth Strategy guides the majority of development to locations within large towns that have the capacity to accommodate new development and integrate within existing infrastructure.

Key Issue 3 Housing Allocation

The preferred option included the re-evaluation of existing housing zonings and the allocation of housing land to ensure continued modest growth. Over 70% of respondents disagreed with the preferred option. Responses stated that the allocation was too low. Locations cited as having too low a housing allocation were Holywood, Millisle and Newtownards. Others considered that Bangor and/or Newtownards should have more, for a range of reasons.

Concern was also expressed that a high amount of the allocation was already committed or constructed. Comments also raised concern that higher allocation to the large settlements could disproportionately disadvantage rural parts of the Borough. Statutory consultees welcomed the commitment to re-evaluate housing zonings, and the advice from DFI Planning was that the Housing Growth Indicator (HGI) should be used for guidance, rather than as a cap on housing development.

Employment Land Evaluation Framework

The majority of responses, 72%, disagreed with the suggested growth strategy for economic development set out in the POP. There was, however, support for the carrying out of an audit and review of the existing employment locations to determine land availability and suitability.

Key Issue 4 Siting of Renewable Energy and Key Issue 5 Renewable Energy in New Development

Whilst over half of respondents supported the preferred options for renewable energy, there were comments on the possible location and number of wind

turbines within the Borough. In regard to the possible location, there were mixed comments, with some respondents preferring a strategic approach, with grouped wind turbines or householder renewable energy devices, and others preferred a case-by-case approach. There was however general support for this option. NIHE strongly supported the use of renewable energy. DFI Planning noted that the preferred option goes further than the requirements of the SPPS. It was also noted that it would be useful to gain views on a wider range of renewable issues rather than considering only wind energy.

Key Issue 6 Rural Housing

Nearly half of respondents supported the retention of the existing approach to rural housing, in line with existing policies and regional direction. Others wished to see changes but also wanted to protect the countryside. DFI Planning noted that the suggested approach to rural housing would involve minor changes and clarification to existing policy. The evidence base in relation to achieving balanced communities was welcomed. NIHE believed that the LDP should limit the growth of dispersed single dwellings in the countryside. NIHE advised that it would like councils to seek to direct rural housing primarily to within villages and small settlements.

Key Issue 7 Affordable Housing

Nearly half of respondents agreed with the preferred option regarding affordable housing, although, concern was expressed on the potential economic impact on house prices and developers choosing to build elsewhere. Statutory consultees welcomed the approach to the delivery of affordable homes. DFI Planning welcomed the information regarding thresholds.

Key Issue 8 Lifetime Homes

Support was expressed for the requirement that all new developments should be built to Lifetime Home standards. Nearly half of respondents agreed with the preferred option, although nearly a third disagreed, and a similar number didn't know. Concern was raised at the potential cost to provide Lifetime Homes and the potential impact on the housing market. Statutory consultees welcomed the approach which would align with the SPPS objectives of the delivery of homes to

meet the full range of housing needs. It was suggested that the associated costs and the relationship with building regulations be considered.

Key Issues 9-10 Open Space and Outdoor Recreation

Over 70% of respondents supported the preferred option. There was recognition of the value of open space for biodiversity and a desire for more allotment spaces within the Borough. Statutory consultees acknowledged that the preferred option reflects the SPPS. DFI Water and Drainage advised of the potential use of open space to help alleviate flooding. The view was expressed that the re-evaluation of existing open space should not result in a loss of open space.

Key Issue 10 Community Greenways

There was strong support expressed in favour of the Greenway development and expansion (75% of the respondents). There was particular support for the safety of cyclists from motor vehicles on public roads. Comber Greenway was identified as successful. Statutory consultees expressed support for the approach suggested. NIHE wished to see the Council work with adjacent councils to ensure that where opportunities exist, greenway linkages across council boundaries are facilitated.

Key issue 11 Health, Education and other Public Services.

Over 64% of respondents agreed with the preferred option and over 75% agreed with the Council's approach to identify and safeguard lands to meet the anticipated needs of the community. Statutory consultees expressed support, reiterating the need for engagement with relevant bodies and service providers to determine the need for additional facilities, so land could be identified and protected within the LDP.

Key Issue 12 Improving Health and Wellbeing Hot Food

60% of respondents supported a restriction of hot food takeaways in proximity to primary schools. There were also questions on how it would work in practice. This issue raised questions about the role of parents in food choice for school children and whether it was appropriate for Council intervention in this way.

Statutory consultees suggested that the Council may wish to explore potential impacts of such a policy on town centres and vacancy rates in town centres.

Key Issue 13 Utilities and Communications Development

Nearly 70% of respondents agreed with the proposed approach regarding mitigation for telecommunication development. However, concern was also expressed that 'mitigation' measures should not be disproportionately prohibitive, to the extent it would slow down or prevent the roll out of important infrastructure to rural communities. Statutory consultees were overall in support of the approach, however, there was a suggestion that policy needs to take account of potential negative impacts. It was also stated that such developments should not be within floodplains and that there should be flexibility in policy to enable planning judgement to be exercised.

Key Issue 14 Cemetery Provision

There were only 10 respondents to this topic, all agreeing with the preferred option. Support was also expressed for a crematorium in the Borough. There was support for Council to consider encouraging green burials, such as, burial practices that do not use up as much space and tree planting provision for the bereaved family. Statutory consultees noted the need for additional burial spaces in parts of the Borough over the Plan period, particularly, in the north of the Borough.

Key Issue 15 Sustainable Waste Management

Over 58% of respondents agreed with the preferred option to identify and safeguard land for waste management purposes. There was opposition expressed by respondents to incineration. Statutory consultees supported the overall approach. DFI Rivers stated that waste management structures should not be located in areas prone to flooding. NIHE agreed with the approach and also suggested that developer contributions could help to secure infrastructure improvements.

Key Issue 16 The Undeveloped Coast

Nearly 70% of respondents agreed with the preferred option to designate a coastal area. DFI Rivers advised that any development within the 1 in 200 years (0.5%AEP) plus climate change coastal flood plain, must be compliant with para.106 to 6.111 of the SPPS.

Key Issue 17 The Developed Coast

Over 80% of respondents agreed with the preferred option to designate urban waterfronts. Designated urban waterfront location suggestions included, Donaghadee, Millisle, Ballywalter, Portaferry, Kircubbin, Holywood, Whiterock, Cloughey, Ballyhalbert, Portavogie, and Groomsport. Statutory consultees agreed with the approach in principle. Natural Environment Division (NED) advised that improved and enhanced access to the coastal areas should not be at the expense of the landscape or natural heritage interest. DFI Planning stated that they would welcome clarification on the policy approach to the wide range of uses along the developed coast, such as, the fishing industry, and other economic uses, including tourism and infrastructure.

Key Issue 18 Coastal Change

Over 77% of respondents were in support of this preferred option. There was also a desire to see areas of the coast known to be at risk from flooding, coastal erosion, or land instability, spatially defined within the Local Development Plan (LDP). DFI Planning advised that the suggested approach did not fully comply with the SPPS. DfE advised that they were proactive in identifying areas of existing and potential coastal erosion and were supportive of the approach.

Key Issue 19 Developing within Areas of Areas of Flood Risk

Over 58% of respondents supported the precautionary approach to development. Some felt that the policy wording was not strong enough and that there should be no development permitted in areas of flood risk, except in exceptional circumstances. Consultees reminded the Council of the need to comply with the SPPS. NED suggested the addition of a third option within the policy for the consideration of proposals that can demonstrate a need for a floodplain location.

Key Issue 20 Sustainable Urban Drainage Systems (SuDS)

Strong support was expressed for SuDS. Nearly 90% of respondents agreed with the preferred option. DFI Planning were supportive of SUDs, and that the Council should consider further implementation. DFI Rivers advised that there should also be information submitted regarding long term management and adoption of SuDS schemes.

Key Issue 21 Protecting and Enhancing the Built Environment

Over 76% of respondents agreed with the preferred option to maintain the existing approach regarding the historic environment. Statutory consultees were supportive of the continuation of the current policy approach to the historic environment.

Key Issue 22 safeguarding Non-Designated Heritage Assets

Over 66% of respondents were in favour of safeguarding non-designated heritage assets. Although, concern was expressed at the potential additional administrative burden this could generate. Statutory consultees welcomed that the Council indicated the desire to protect non-designated heritage assets and the value of formulating a local heritage list, to help maintain the distinct character and history of the area but also queried how this would operate in practice.

Key Issue 23 Protecting International and National Nature Conservation Interests

There was support expressed for the environmental benefits and associated social and health benefits, which natural heritage assets can provide, for residents living in settlements throughout the Borough and wider province.

Nearly 60% of respondents were in favour of the preferred option. There was support for the continued protection and enhancement of local nature conservation sites and scenic landscapes. There was particular interest in the retention of the Groomspoor Rural Landscape wedge. Statutory consultees were in support of the current policy framework for the natural environment.

Key Issue 25 Areas of Outstanding Natural Beauty (AONB)

Over 73% of respondents were in favour of bringing forward bespoke policy for the Strangford and Lecale AONB. Statutory consultees welcomed the preferred option which recognises the unique characteristics of the AONB.

Key Issue 26 Economic Development within Settlements

Nearly 70% of the public who responded, agreed with the preferred option to evaluate existing zonings for economic, employment land. Statutory consultees welcomed the approach. DFI Planning welcomed the pragmatic approach to de-zone land if required. Invest Northern Ireland (INI) were supportive of the review, however, cautioned that there should not be a reduction in the overall supply of land. DFI Water and Drainage reminded of the use of SuDs within economic land and NIHE supported locations within the Urban Footprint.

Key Issue 27 Business Start-Ups and Flexible Co-Working Spaces

There was considerable support expressed for this option. Nearly 70% of respondents agreed with the preferred option. There were a range of locations suggested including, co-location with other businesses, within or adjacent to existing zoned sites, in existing business centres, and not in new zones where networking is limited. Statutory consultees were supportive of this approach. INI outlined that there can be considerable costs associated with starting a new business venture. Suitable accommodation available would in their view, afford investors and entrepreneurs the opportunity to grow their business. DFI Planning advised that the use of redundant buildings, land on existing development zonings for these purposes, is encouraged in the SPPS.

Key Issue 28 Rural Economy

There was support for the suggested approach. Nearly 80% of respondents agreed with the preferred option for rural economic development. INI stated that they considered the suggested approach would control rural economic development but will also support development of an appropriate nature and scale to sustain vibrant rural communities. DFI Planning noted that the approach is in line with the regional approach.

Key Issue 29 Class B1 Business Uses

This approach, which suggested a more flexible approach to allow B1 Business uses within certain district centres and economic employment zonings, received considerable support, with 72% of respondents agreeing with the preferred option. Statutory consultees welcomed the preferred approach. DFI Planning suggested that there was a need for evidence for alternatives outside town centres in relation to B1 Business use. INI were supportive but added that there may, however, be occasions where certain established industries may wish to develop additional elements to their business to further develop, which would be required to demonstrate that there are no appropriate sites with centres to accommodate their scheme.

Key Issue 30 Safeguarding Existing Employment Land

This key issue to safeguard against the loss of economic employment land but permit alternative employment uses was received with a mixed response. Just over half of respondents agreed with the preferred option, however, nearly a third disagreed. Supportive comments considered that this option would improve the options available for use of land and would safeguard against further loss. Others felt that this approach could lead to a further loss of employment land. DFI noted the “alternative uses” referred to by the Council and suggested that there may be compatibility issues within the policy provisions in the SPPS.

Key Issue 31 Safeguarding Minerals

Just over 36% of respondents agreed with the preferred approach to minerals. 32% of respondents disagreed and a further 32% said that they didn't know. There was support for Areas of Constraint on Mineral Development (ACMDs) to be identified within the Plan and that the area identified should include those species and habitats most at risk in terms of environmental impact and not just include Areas of High Scenic Value (AHSV). The Local Development Plan should identify areas most sensitive to mineral development. DFI Planning acknowledged that there is work ongoing to collate information on mineral supply and demand information and reminded the Council of the need for the Draft Plan Strategy to consider the range of mineral issues including valuable minerals,

safety and amenity, visual implications, restoration of minerals workings, peat extraction and unconventional hydrocarbon extraction.

Key issue 32 Hierarchy of Centres

Over 65% of respondents agreed with the preferred option to define a hierarchy of centres based on the settlement hierarchy. Statutory consultees welcomed the approach. DFI Planning advised that the Council should use the Hierarchy of Settlement and Related Infrastructure Wheel Diagram 2.2 within the Regional Development Strategy to help identify the level of appropriate services and facilities.

Key Issue 33 Town Centres and Retail Cores

51% of respondents agreed with the preferred option to define the extent of town centre boundaries. There were however, contrasting views on their extent. Some respondents said that the LDP should increase town centre boundaries. Whilst others stated that with the changing nature of retailing, town centres should be compressed into a more concentrated offering. Over 63% agreed with the designation of primary retail cores. Statutory consultees welcomed that the Council would undertake an assessment of need or capacity for retail and other town centre uses. NIHE supports the town centre first approach to ensure that the town centres are vibrant mixed-use areas, which reflect the SPPS.

Key Issue 34 Town Centres and Retailing

63% of respondents agreed with the preferred option. There was support for adopting flexible approach to facilitate non class 1 uses. There was a desire to see more twilight and night-time economies. DFI wished to see how this would work in practice. NIHE would like to see some flexibility when zoning land in town centres to support activities beyond retail, including leisure uses.

Key Issue 35 Areas of Protected Housing

There was strong support expressed for protection of existing housing. Over 82% of respondents agreed with the preferred option, with the view expressed that housing increases the vitality of a town centre. NIHE expressed support for

increasing the supply of affordable homes through town centre living initiatives. DFI Planning advised that they wished to see more evidence to assist in the appraisal of this option.

Key Issue 36 Development Opportunity Sites

There was support expressed for Development Opportunity Sites (DOSs). 69% of respondents agreed with the preferred option. It was conveyed that flexibility would enable “pop-up” shops in vacant units, events or annual festivals and sustain a town centres vibrancy. Statutory consultees supported the role that “meanwhile uses” may play to support the vitality of an area.

Key Issue 37 Tourism

Over 85% of respondents agreed with the preferred option and the sustainable tourism approach. Others stated that they understood the economic drivers and benefits of tourism. However, stated that parts of our area are particularly sensitive and therefore, we would not wish to see them compromised by tourist developments. Statutory consultees noted that much of the tourism potential is situated along the coastline and queried whether there could be a conflict with other policies in the plan, such as, the coastal policies or those which protect the natural environment. Others advised that regional policy directs the safeguarding of tourism assets from unnecessary, inappropriate or excessive development.

Key Issue 38 Sustainable Transport and Active Travel

Nearly half (48%) of respondents were in agreement with the preferred option, however, over 40% disagreed. Statutory consultees welcomed this approach, which is in line with the regional approach, which seeks to reduce the need for motorised transport and encourages active travel.

Key issue 39 Park and Ride/ Park and Share

There was strong support, (over 86% of respondents) for the identification of Park and Ride/Park and Share facilities. Statutory consultees advised that the approach will also allow for reviews to be undertaken in relation to existing and proposed sites within extant plans.

Key Issue 40 Reducing Reliance on the Private Car

Nearly half (45%) of respondents were in agreement with the preferred option regarding introducing areas of parking restraint, although 40% of those who responded disagreed. Whilst support was expressed for reducing the reliance on the use of the private car it was not always possible. Existing connectivity by bus services was raised, with the Peninsula being poorly served by buses which are poorly timed and sparse, so many people have little choice but to drive to Newtownards or Bangor in order to access other public transport options, or to shop. Statutory consultees welcomed the promotion of active travel networks and sustainable transport and advised that the coordination of the three aspects set out in Key Issue 10 “Community Greenways”, Key Issue 38 “Sustainable Transport and Active Travel” and Key Issue 42 “Disused Transport Routes”, will be necessary to deliver a coherent functional network.

Key Issue 41 Proposed Routes for Future Transport Schemes

Over 65% of those who responded agreed with the preferred option regarding future transport schemes. There was support expressed for the protection of proposed transport routes. Statutory consultees encouraged ongoing engagement with DFI TPMU, regarding the status of transport schemes and transport plans.

Key Issue 42 Disused Transport Routes

The proposal for protection of disused former transport routes was viewed as beneficial to the environment and also to improve connectivity to and from a site. Transport routes highlighted by respondents in particular, were the old line between Holywood and Bangor and a Newtownards to Donaghadee Greenway. Statutory consultees supported a co-ordinated approach between the identification and safeguarding of disused transport routes, the promotion of active travel networks, sustainable transport and the identification and protection of greenways.

Introduction

- 1.1 The Preferred Option Paper (POP) is a consultation document in the preparation of the Local Development Plan (LDP). It aims to encourage public engagement and facilitate interested parties to become involved at the earliest stage of plan preparation; it identifies key issues in the Borough and outlines options to address these issues, including the Council's preferred options.
- 1.2 Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, states with regard to public consultation on the POP that, 'A Council must take account of any representations made in accordance with paragraph (2) before it prepares a development plan document'.
- 1.3 This report provides an outline of the Ards and North Down LDP 2032 POP consultation process. It contains a summary of public and consultation body responses received in relation to the main subject areas within the POP and the Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) process and consideration of them.
- 1.4 This public consultation report provides an overview of the main findings of the public consultation exercise on the Council's LDP POP. It was prepared following a detailed assessment of the comments received to the public consultation. It is not intended to be a comprehensive report on every comment received, but rather a summary of the key issues, reflecting the responses received. Ninety-three questions were posed in total, and the report is structured outlining the response to each question posed in sequence. The public response is summarised, as are those of some of the consultation bodies, also known as Statutory Consultees in the planning process.
- 1.5 The first five questions within the questionnaire captured personal information. The survey/questionnaire did not require all questions to be answered, allowing instead respondents to answer only the questions they chose. Citizen Space has been used to analyse and identify trends from the responses received. Responses were received digitally within the Citizen Space questionnaire and also submitted via e-mail or hard copy. These responses were reviewed and

analysed. The analysis identified responses as 'Supportive'; 'Not Supportive'; or 'Neutral/Other.'

1.6 These terms were defined as:

'Supportive' – respondents answered 'yes' in the consultation response form or comments were judged to be generally supporting the proposed approach. (Please note that many of these respondents also raised concerns but were judged to be supportive of the approach overall).

'Non-Supportive' – respondents answered 'no' in the consultation response form or comments were judged to be generally against a proposed approach.

'Neutral/Other' – respondents did not answer 'yes' or 'no' in the response form or it was unclear from the comments submitted whether the respondents were supporting the proposed approach or not, or where alternative suggestions for the particular key issue had been provided.

1.7 The public response has been displayed in graph form, where responses allow, alongside a summary of comments. Not all questions posed received the same level or detail of response.

Consultation Body Comments

1.8 The views expressed by the Consultation Body have been reviewed and an overview is presented to reflect the response to the issues presented in the (POP).

Consideration and Next steps

1.9 The consideration of the public respondents and the consultation bodies are presented after each topic

Site Specific Responses

1.10 The POP did not specifically seek representations relating to lands for consideration in the LDP process. However, 29 site specific representations have been received by the LDP team. Where these included opinions on preferred options and issues, these comments have been included in the analysis.

- 1.11 The site-specific information submitted will be held by the Council without prejudice for information purposes only. The Council have encouraged the public to register on the LDP 'Interested Parties List' to be formally notified of the progress of the LDP and any future request for sites.
- 1.12 A list of those who submitted comments in relation to the POP during the consultation period is provided in Table 2.

Preferred Options Paper (POP) – Consultation Process

- 1.13 The consultation period for Ards and North Down Local Development Plan (LDP) Preferred Options Paper (POP) was launched on 28 March 2019. The consultation took various forms such as advertisements in the local press, public engagement sessions, as well as social media.
- 1.14 The Council identified an inadvertent omission from its online version of the POP, which had implications in respect of compliance with the relevant regulations for its consultation exercise. To ensure that the Council had fully complied with the legal requirements of Section 11 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, it was necessary to run the consultation period in a full 12-week manner from Friday 17 May 2019. The public consultation ran for a period from 17 May 2019 until 4.30pm on 9 August 2019.

Launch Event

- 1.15 The launch event took place on 25 March 2019, at Ards Arts Centre, Conway Square, Newtownards. Issues raised have been captured and presented in Table 1.

Local Council Offices/ Display Information

- 1.16 Hard copies of the Preferred Options Paper and associated documents were available to view at the Planning office at Church Street, Newtownards and the City Hall, Castle Park Avenue, Bangor. Planning Officers were also available for drop in advice regarding the POP at the Planning Office, Church Street, Newtownards.

Public Notice in Local Newspapers, Advertisement and Press Release

- 1.17 In accordance with Regulation 10 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, advertisements were placed in the “Newtownards Chronicle” and the “County Down Spectator” on 28 March 2019 and 4 April 2019.
- 1.18 The adverts for the second consultation period were placed in the “Newtownards Chronicle” and the “County Down Spectator” on 16 May 2019 and 23 May 2019.

Summary Booklets

- 1.19 A Summary Booklet was produced to give a broad overview of the information within the POP in an easier to read format, which was shared at engagement events and on the Council website: POP_Summary_Document.pdf (ardsandnorthdown.gov.uk).

Public Engagement Events

- 1.20 Details of the Public Engagement Events and a photograph of the typical event setup can be seen in Appendix 2. Appendices 1 and 4 detail the dates and locations of drop in events. Planners from the LDP team were present at these events to answer questions on the POP and explain the new Local Development Plan process. A total of 74 people availed of the opportunity to meet Planners to discuss the POP at these events. Issues raised at these events are summarised in Table 1.

Internal Communications

- 1.21 Community Planning Partners, strategic Partners and stakeholders were sent an e-mail outlining the launch of the POP drop-in events and consultation information.
- 1.22 Regeneration colleagues were sent an e-mail outlining the launch of the POP drop-in events and consultation information to share with any interested parties, including the members of the Town Centre Steering Groups. The launch of the POP was featured within Ards and North Down’s April 2019 staff Bulletin ‘News AND Info’ (Appendix 3).

Additional Engagement

- 1.23 LDP members attended meetings with the Council's Community Planning team and partners, the Council's Section 75 group, Disability Forum and the Third Sector Forum, outlining the launch of the POP and indicating particular areas of interest to attendees.

Social Media

- 1.24 Social media tools were used to maximise the audience reach, these included both the platform formerly referred to as 'Twitter' and Facebook (Appendix 5).

Web based consultation

- 1.25 The Council's website provided a link to the POP and associated documents. The link was located on the Planning Section of the Council website under the LDP subsection.
- 1.26 The hyperlink directed users to the Citizen Space survey. Screenshots from the Consultation Hub can be seen in Appendix 6.

Consultation Responses

- 1.27 Responses to the POP were received in various formats: -
- Online consultation responses;
 - Hard copies of online questionnaire;
 - Letters;
 - E-mails; and
 - In person engagement with the Local Development Plan (LDP) team.
- 1.28 A list of respondents is shown in Table 2, Site Specific Responses have been tabulated in Table 3.

Consultation Body Comments

1.29 In line with Part 1 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, statutory consultees were consulted on the Council's POP. Statutory consultees include:

- Northern Ireland Government Departments;
- The council for any district which adjoins that of the council carrying out the consultation;
- A water or sewerage undertaker;
- The Northern Ireland Housing Executive (NIHE);
- 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 licence has been granted under Article 10(1) of the Electricity (Northern Ireland) Order 1992;
- Any person to whom a licence has been granted under Article 8 of the Gas (NI) order 1996.

1.30 It is not considered necessary to include the full consultation response from each statutory consultee in this report. The main comments have been captured and included. Engagement with consultees is ongoing throughout the Local LDP process

Sustainability Appraisal (SA) Interim Report

1.31 20 responses were received which were in relation to the Sustainability Appraisal (SA) Interim Report. These are detailed further at paragraph 4.47 of this report.

Response Analysis

1.32 Analysis took place within Citizen Space; preferred options feedback is presented graphically in this report and the main points raised outside of the digital platform was added and analysed within Citizen Space.

Public Questionnaire

- 1.33 The public were asked their opinion on each preferred option, the approach suggested in the POP and offered the opportunity to make additional comment. The same questions were posed within an online Citizen Space survey.

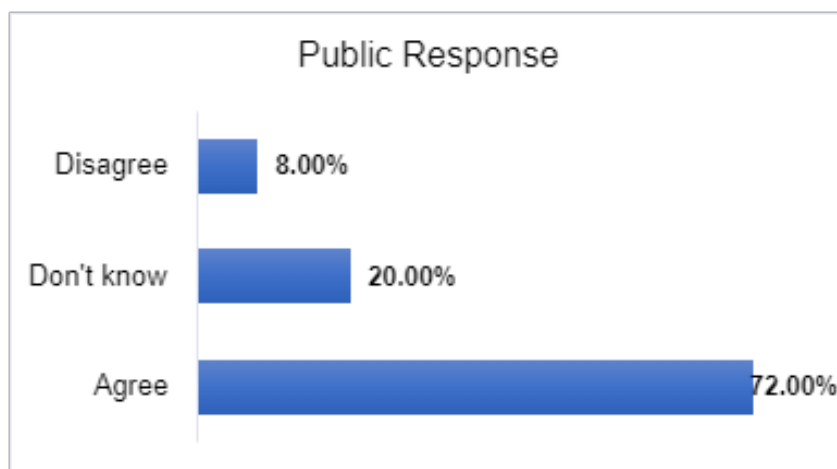
Consultation Responses

Ards and North Down Profile, Vision, Aims and Objectives

We Asked

Do you have any comments on the District Profile and Policy Strategy that should be taken into account when preparing the Plan Strategy (PS)?

48 responses



Issues Raised

- Whilst support for the Plan Vision was expressed, some respondents wished to see more growth in the Borough for residents and visitors through increased tourism and employment.
- Others expressed a wish for less development and an increased regard for the protection and enhancement of the natural environment.
- There was both support and opposition regarding the economic impact of mineral development.
- There was a repeated desire to see more ambitious growth for the Borough over the plan period.
- A number of responses advocated that the duration of the plan period should be amended to extend beyond 2030, to 2035 or 2040.
- Reference was made to Belfast City Council's much higher growth aspirations.

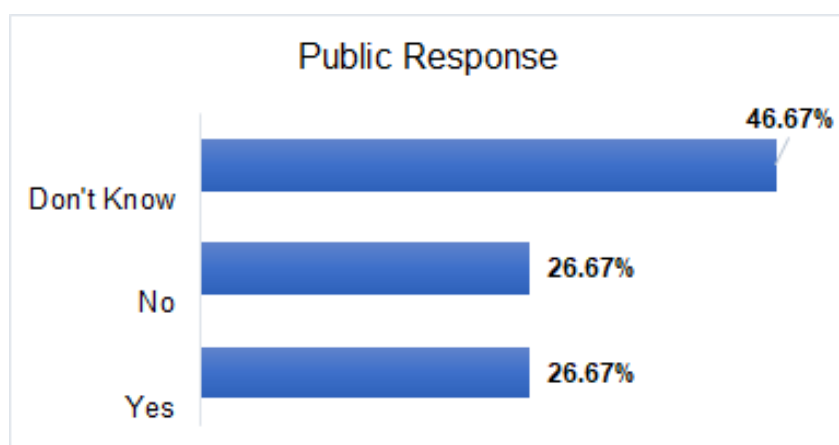
- One comment on the Borough stated that the Borough is more than two large towns; that it has a strong and strategically important rural community made up of both rural towns, villages, and the rural population.

Consultation Body Comments

- 2.1. Northern Ireland Housing Executive supported the shared Local Development and the Council's Community Plan (The Big Plan) shared Vision, that "Ards and North Down is a vibrant, connected, healthy, safe and prosperous place to live." NIHE agreed that the LDP system should adopt a place shaping approach and incorporate linkages with other functions, such as, community planning and local economic development.
- 2.2. The Department of Agriculture, Environment and Rural Affairs (DAERA): Forest Service advised that sustainably managed forests can contribute to the LDP vision.

We Asked

Do the aims and objectives strike the right balance between social, economic and environmental considerations? 34 respondents



Consultation Body Comments

- 2.3. NIHE stated their support for the Strategic Objectives. In particular, NIHE welcomed the social objective to provide a sufficient supply of land for new housing to meet the housing needs up to 2030 and to facilitate a diverse range

of specific housing need over the Local Development Plan period. In addition, NIHE supported the Environmental and Economic objectives and the promotion of sustainable high-quality design in all development to assist with climate change adaption and place making.

- 2.4. DFI Planning stated that they wished to see other aspects of the settlement hierarchy, such as the approach to development in small towns, which are neither large nor rural, for example Holywood, Comber and Donaghadee.
- 2.5. The Department welcomed the Council's alignment of the 5 Core Planning Principles of the Strategic Planning Policy Statement (SPPS), which in addition mirror the outcomes of the Community Plan (The Big Plan).

We Asked

Are there any issues that we have missed from our Vision, Aims or Objectives? 29 respondents

Issues Raised

- Some advised that there was nothing missed in the Vision, Aims and Objectives, other respondents indicated that there was a desire to see more emphasis on sustainable transport, the climate emergency, air quality, increased use of brownfield land (particularly in town centres), solutions for social, affordable houses and specific housing for the ageing population in the Borough.
- There was also a desire that the Local Development Plan Vision and Objectives, should acknowledge and aim to enhance the relationship between the Borough and the Belfast Urban Area, and the clustering of Newtownards with Belfast.
- There was a desire for more ambitious growth.

Consideration And Way Forward

We welcome the range of responses received. As time has passed since the publication of the Preferred Options Paper (POP), updates are required to take account of new information, strategies, such as the commitments contained

within the Climate Change Act (Northern Ireland) 2022. The aims and objectives of the Draft Plan Strategy (dPS) will be updated as necessary.

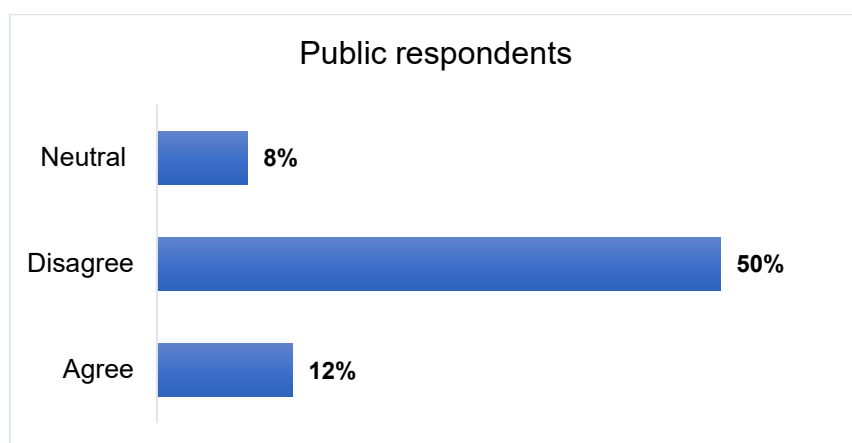
- The Vision reflects that of The Big Plan, the Community Plan for Ards and North Down.
- We acknowledge the challenges to have a balance between social, economic and environmental considerations and will consider the responses received to ensure that the dPS presents a balanced approach.
- We will consider the need for additional objectives, and we will consider making revisions to the objectives to update the Borough's aspirations.
- There will be opportunity for further engagement with the public and communities throughout the consultation processes that will follow publication of the dPS and Draft Local Policies Plan (dLPP).

Key Issue 1 – Developer Contributions

Our Preferred Option - Option 1a: Provide strategic policy on developer contributions through the Local Development Plan and identify sites where developer contributions would be appropriate in the Local Policies Plan (LPP).

We Asked

Do you agree with the preferred option? 38 respondents



Issues Raised

- There was strong support in the comments expressed by some respondents, for developer contributions however, the vote expressed, shows a majority of respondents disagree with the preferred option.
- Concern was expressed regarding possible consequential impact on development in terms of housing prices, viability and the attractiveness of the Borough for investment.

Consultation Body Comments

- 2.6. The Northern Ireland Housing Executive strongly agree with the aim of developer contributions, which mean that developers would be required to bear reasonable or proportionate costs of works to facilitate their development proposals. The NIHE would like to see the provision of affordable housing through developer contributions. In addition, NIHE believe a developer contribution should help to provide infrastructure, including water infrastructure, allowing the release of further land for development.
- 2.7. DfI Planning welcomed the amplification text which highlights that the precise policy formulation for developer contributions will require careful consideration and that contributions may only be sought where they are necessary in planning terms, reasonable and directly related to the development. It is noted that contributions will not be sought for all developments and that the Plan Strategy will clarify when contributions are sought, the anticipated level of contribution and exemptions if necessary. The Department advised that there is not a legislative provision in Northern Ireland for any type of non-negotiable levy on development similar to the Community Infrastructure Levy in England and Wales.
- 2.8. DfI Water and Drainage Division stated that at present, NI Water cannot accept financial contributions from developers to build additional wastewater treatment

facilities for proposed new developments. Any proposed new developments that require additional treatment facilities, would need to be built and paid for by the developer.

- 2.9. NI Water also advised that they offer a Reasonable Cost Allowance for all new developments which is NIW's contribution to the development of new infrastructure.
- 2.10. The Department for Communities (DFC) Housing Policy response stated that while Councils can develop their own policies on developer contributions, the Department does not have a specific policy, and it would be for a new Minister to determine if a policy should be put in place.
- 2.11. DfI Rivers advised that developer funded flood defences to facilitate development within a flood plain would not be acceptable.
- 2.12. NI Electricity Networks outlined that proposals for electricity infrastructure promote connectivity, which aim to ensure a secure and reliable supply of electricity across Northern Ireland, are considered a community benefit in itself. They suggested that developer contributions are not applicable in respect of these proposals in that context. The approach to developer contributions, therefore, needs to be carefully considered to ensure that this community benefit is not diluted.

Consideration And Way Forward

- The public respondents to developer contributions noted the potential benefits and also raised the concern that developer contributions could have a negative impact on development, house prices and investment within the Borough.
- It is noted, that as stated by the Consultation Body responses, that developer contributions have limited application at present and that the legislative framework in Northern Ireland does not allow for application at present.
- We note the difficulties expressed regarding holding monies by NIW.

- We note the mixed responses to the preferred option and will take account of the comments raised by statutory consultees.

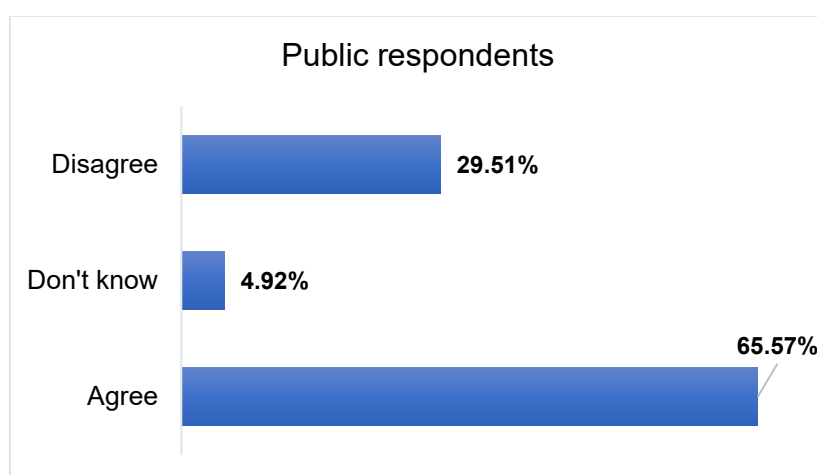
Key Issue 2 - Spatial Growth Strategy

Settlement Hierarchy

Our Preferred Option – Option 2b: Define a new settlement hierarchy allowing for the re-classification of existing settlements and potential introduction of new settlements.

We Asked

Do you agree with the Preferred Option? 61 respondents



We Asked

Do you think the existing settlement hierarchy should be maintained or that settlements should be re-classified within the hierarchy and new settlements identified? 46 respondents

Issues Raised

- Strong support was received for the reviewing of the settlement hierarchy within extant plans and that the preferred option allows for a consistent approach within the Local Development Plan to settlement designation based on a settlement's role and function within the Borough.
- There was support for Ballygowan and Portaferry being moved to the small-town tier.

- There was also concern expressed as to whether these settlements had the infrastructure required.
- There was also concern expressed by the public that potential changes to the hierarchy would negatively affect the potential for additional growth in the larger towns.
- One response stated that the evidence is that over the last 10 years there has been a disproportionate amount of growth in smaller settlements. If this pattern were to continue, it could affect the role of larger settlements.

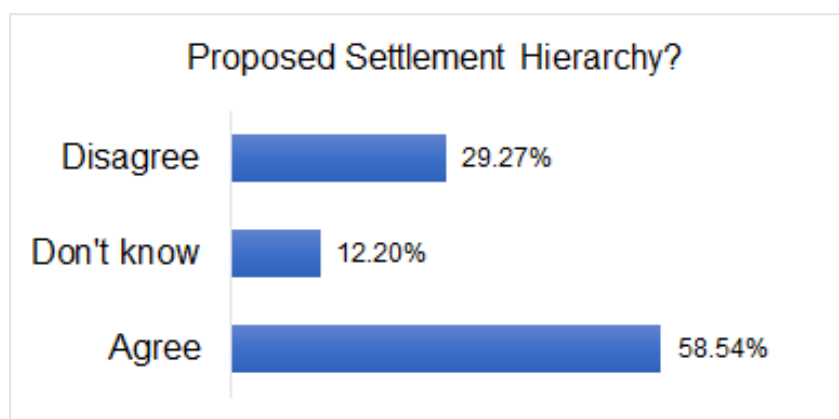
Consultation Body Comments

- 2.13. Northern Ireland Housing Executive expressed support for the preferred option 2b to allow re-classification of settlements within the hierarchy and new settlements to be identified. The flexibility of allowing the identification of new small settlements within the hierarchy is welcomed, as this may help to reduce unsustainable forms of development in the open countryside, such as, single rural dwellings and help prevent rural sprawl.
- 2.14. DfI Water and Drainage Division advised that the settlement hierarchy should reflect the principles of 'Sustainable Water: A Long-Term Water Strategy for Northern Ireland (2015-2040)'. Wastewater treatment capacity should be a key consideration when zoning land for development and when considering settlement hierarchy.
- 2.15. DFI Planning supported the approach to re-evaluating the extant plan hierarchies to ensure consistency. The Regional Development Strategy (RDS) Spatial Framework aims to focus investment on Main Hubs and Clusters. The framework also acknowledges that access to services and facilities is important, but creating a critical mass to support a level of services raises challenges for service providers in meeting the needs of spatially dispersed populations. The Framework also promotes co-operation rather than competition between places, and encourages clustering of Hubs, so that services do not need to be duplicated but rather shared. DFI advised that the Council should avoid giving the

impression that services and infrastructure can be provided in any location that experiences enough population growth.

We Asked

Do you agree with the indicative settlement hierarchy shown in the Preferred Options Paper (POP)? 41 respondents



Q15. Do you have any suggested changes? Are there any new settlements that you think should be considered? 32 respondents

- Craigantlet should be classed as a village.
- Ardkeen as a small settlement.
- Ballywalter should be classified as a small town instead of Ballygowan or Portaferry.
- Whiterock should be re-classified as a small settlement.
- There is more justification that Portavogie and Ballywalter be reclassified sometime in the near future as a small town, rather than the much smaller Ballygowan or Portaferry.
- Millisle fulfils most of the functions associated with a small town.

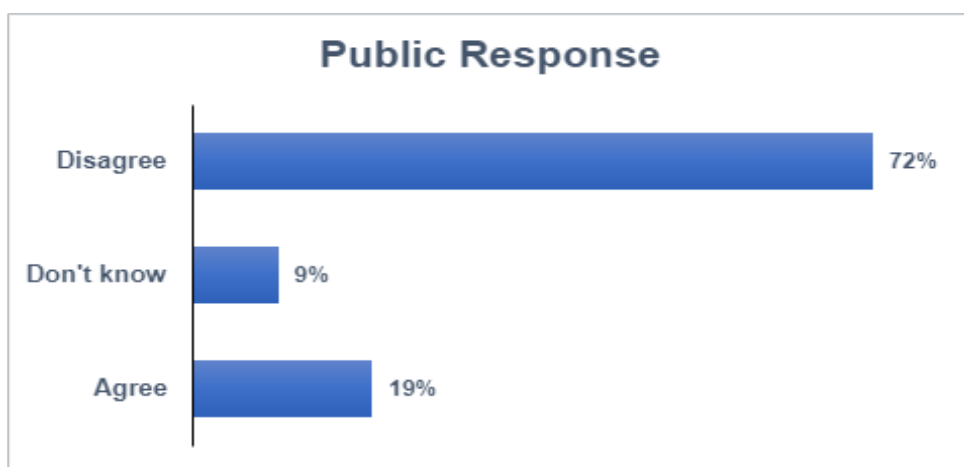
Consideration And Way Forward

- We welcome support for the reclassification of the settlement hierarchy. Further work will be undertaken to review the settlement hierarchy alongside additional engagement with statutory consultees.

- The reviewed settlement hierarchy will be supported by studies of each settlement evaluated against the evidence base and regional policy. The methodology of which will be contained within the supporting evidence papers published alongside the Draft Plan Strategy (dPS).

We Asked

Do you have any comments on the Spatial Growth Strategy – Economic Development? 31 respondents



Issues Raised

- The majority of responses disagreed with the suggested Growth Strategy – Economic Development.
- Approximately half of respondents wished to see Bangor being the focus of more growth. Reasons for this included its proximity to Belfast.
- Others disagreed with the Growth Strategy, stating the view that it would see a disproportionate allocation of development within the larger settlements with support expressed that growth is proportionately distributed across all areas, including the smaller settlements and rural communities.
- Other responses endorsed the approach of undertaking a full audit and review of the existing employment locations to determine land availability.
- Comments in support stated that growth should be focused on the major towns and by concentrating growth in this manner, all the benefits will be easier to realise, particularly job creation, in line with the economic strategy.

Consultation Body Comments

- 2.16. DFI Planning noted that the Spatial Growth Strategy guides the majority of development to locations within large towns that have the capacity to accommodate new development and integrate with existing infrastructure. The Department also noted that the strategy also refers to the need to maintain and protect the diversity and quality of the rural area and diversification of the rural economy. The emphasis at strategic level is on focusing housing growth on larger settlements and in particular on the Hubs and Clusters of Hubs.

Consideration And Way Forward

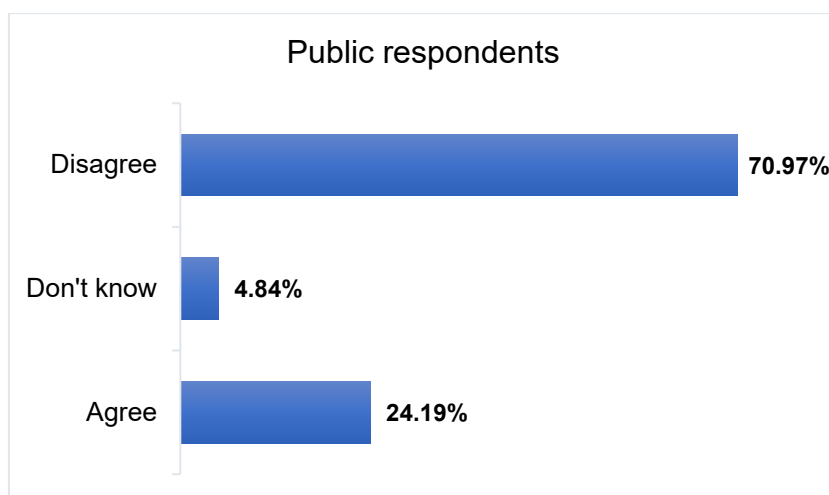
- We welcome the range of responses received and will take account of all the issues raised when considering the Spatial Growth Strategy.
- We note the responses received regarding the growth strategy for the Borough and will take account of the feedback received.
- We and will be reflecting further on the appropriate level of growth for each tier in the hierarchy.

Key Issue 3 - Housing Allocation

Our Preferred Option – Option 3b: Re-evaluate existing housing zonings and allocate additional housing land, if required, to ensure continued modest housing growth using sequential approach in the Strategic Planning Policy Statement.

We Asked

Do you agree with the Preferred Option? 62 respondents



Do you have any suggested changes? Are there settlements that you think should receive a higher, lower housing allocation? 43 respondents

Issues Raised

- The general view was that the allocation was too low.
- Concern was expressed that higher allocation to the large settlements will disproportionately disadvantage rural parts of the Borough.
- It was also stated that the plan period was too short (2015-2030) and that it should be extended to 2037 or 2040.
- There was support expressed that housing should be in the right place to meet demand, however, some divergence as to where the right place would be within Ards and North Down.
- That the projected allocation for Holywood was too low, with the consequence that they must look elsewhere for suitable and affordable housing.
- That Millisle has a considerably lower housing availability than comparable settlements such as Portaferry, Portavogie and Cloughey.
- That the growth of Newtownards must not be used as justification to impose significant constraint in other settlements, especially Bangor, which is by far the largest settlement in the Borough, and the fifth largest in Northern Ireland.
- That a high amount of the allocation was already committed or constructed.

Consultation Body Comments

- 2.17. Northern Ireland Housing Executive agreed with the preferred option. NIHE supported a review of existing uncommitted housing land to assess the deliverability of new residential development to address housing needs and would like to see this assessment include a survey of existing landowners, to see if they are willing to provide their land for future housing development.
- 2.18. NIHE also supported the delivery of new housing on a 'plan monitor and manage' basis, commenting that additional phases of land or areas of possible future housing growth should be indicated within the Local Development Plan housing strategy, and that these could be released as part of a plan review, should housing need arise, or if development in zoning is not forthcoming.
- 2.19. DFI Planning welcomed the commitment to re-evaluate housing zonings and allocating additional land, if required, to ensure continued modest housing growth.
- 2.20. DFI welcomed the acknowledgement that the Housing Growth Indicators (HGI) are prepared as a guide for the preparation of the LDP. This accords with the Department's advice that the HGI should be used for guidance rather than seen as a cap on housing development or a target to be achieved. DFI advised that as the Council has projected forward the amended HGI for 2012-2025 (7,100) on a pro rata basis to give a figure of 8,190 for the plan period, it is important that any local adjustment of the HGI is based upon robust evidence. Similarly, the evidence and analysis in position papers should support and provide justification for the housing requirement to be planned for.
- 2.21. The Department appreciated that in bringing forward the Plan Strategy the Council must have regard to the provisions of extant area plans and consider how best to manage the transition to the new LDP system, especially in relation to the application of the updated HGI evidence.
- 2.22. DfI Water and Drainage division advised that the Council needs to discuss its proposals with NI Water (NIW), detailing size and location of proposed

development, to enable NIW to give an accurate assessment of local capacity/network issues.

- 2.23. DfI Rivers advised that small rural developments, particularly single dwellings, should not be located in areas known to be at risk of flooding, in addition they can have a cumulative effect in increasing flood risk. Any potential increase in flood risk should be avoided or mitigated against by suitable Local Plan Policies.

Consideration And Way Forward

- We welcome the range of views expressed on this topic and we note that there is disagreement with the preferred option.
- We acknowledge the feedback from the public respondents regarding the Housing Growth Indicators and the desire for a higher level of housing being appropriate for Ards and North Down.
- We note preferences for the location of such housing and advise that housing zonings will be reviewed and identified at Local Policies Plan (LLP) stage.
- We note the responses from DfI and will engage further with them in advance of Draft Plan Strategy publication.
- We note the various suggested appropriate housing allocation and advise that the Local Development Plan will be advised by the evidence gathered to support the Plan, which will include the most recent Annual Housing Monitor information.
- An Urban Capacity study will be undertaken to add to the evidence for housing potential in settlements across the Borough.
- The LDP plan period will be revised to 2017-2032.

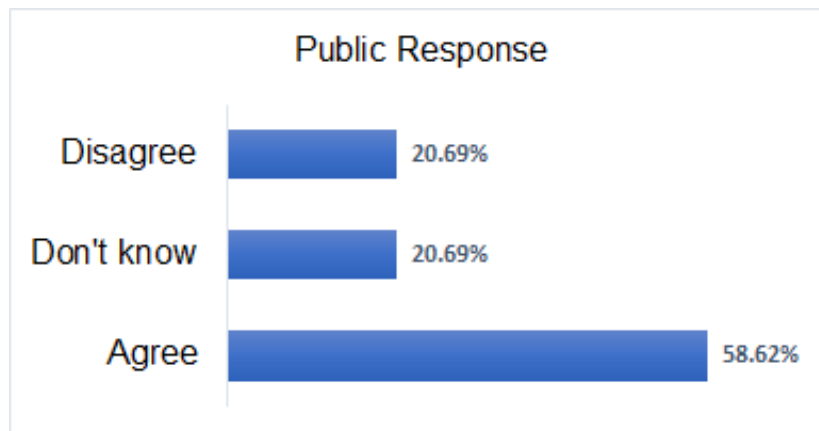
Key Issue 4-5 - Energy

Facilitate the siting of Renewable Energy generating facilities in appropriate locations

Our Preferred Option – Option 4b: Consider all renewable energy proposals coming forward on a case-by-case basis whilst adopting the ‘cautious approach’ within designated landscapes as endorsed by the Strategic Planning Policy Statement (SPPS).

We Asked

Do you agree with the preferred option? 29 respondents



We Asked

Do you agree with the Council's approach in relation to wind turbines in sensitive landscapes? 14 respondents

Issues Raised

- Whilst there was support for renewable energy, concern was expressed on the possible location and number of wind turbines within the Borough. There were mixed views on the possible location of wind turbines with some respondents preferring a strategic approach with grouped wind turbines or householder renewable energy devices and others preferred the case-by-case approach.
- Concern was expressed on the visual impact of wind turbines, where there are so many that they dominate the rural landscape and considered to detract from the natural beauty of an area. Others note that the Ards Peninsula should not miss the opportunity to harness wind energy due to the potential economic rewards for the Borough, as well as, ensuring sustainability and resilience for the future.
- Support was expressed for Strangford Lough based research and long-term production of marine based energy, such as, the (now removed) marine current turbine that had been the subject of previous research.

- There was also support for individual homes to have small, vertical axis generators given that wind can generate power at night when solar energy is unavailable.
- Concern was also expressed regarding possible noise pollution from wind turbines, particularly at night, and the desire that this should be a factor within the assessment, as well as the views of tourists who visit the Borough to enjoy the natural unspoiled vistas.

Consultation Body Comments

- 2.24. DfI Planning noted the intention of the Council to bring forward policy that will reflect the regional policy of the Strategic Planning Policy Statement, however, noted that the text appears to focus on wind energy development. DfI believe it would also be useful to seek views on a wider range of renewable issues and areas as outlined within the context.
- 2.25. The Department advised that up-to-date information on landscape character assessments will support decision making in relation to the capacity of the landscape to absorb renewable energy development.
- 2.26. Natural Environment Division (NED) advised that the consideration of renewable energy proposals should be informed by an up-to-date Landscape Character Assessment. The potential impact on designated natural heritage sites must also be considered, especially where there is the potential to impact on the 'flight-lines' of birds using international sites.
- 2.27. DfI Rivers advised that solar farms should not be located in areas at risk of flooding as this can increase flood risk, cause damage to the panels and control equipment, leading to disruption of output.
- 2.28. The Minerals and Petroleum Branch of the Department for the Economy (DfE) outlined the role that the planning system can play in mitigating and adapting to climate change and supporting the shift towards a low carbon economy. They advised that the POP recognises the contributions that wind and other renewable

energy options can make including, but not limited to, photovoltaic solar panels and small wind turbines for electricity production, solar hot water heating systems and geothermal systems for space heating and cooling. They further advised that the Ards and North Down Council area contains rocks that are particularly suitable for the development of heating and cooling systems using shallow aquifers, e.g. ground source heat pump systems (GSHPs).

Consideration And Way Forward

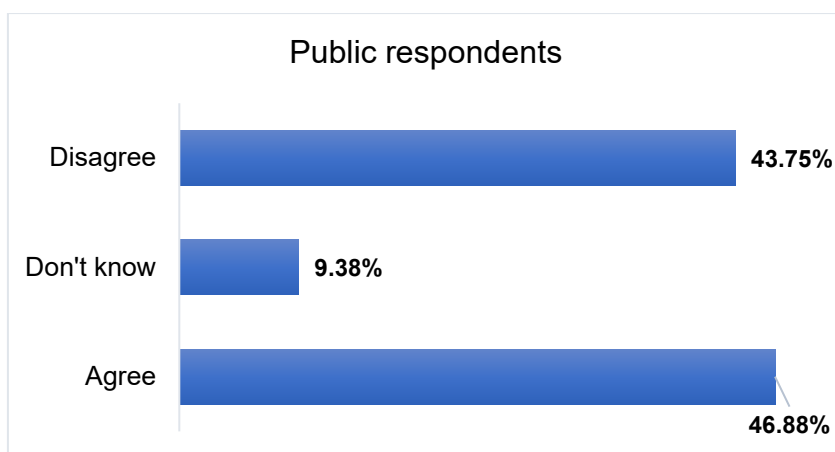
- We welcome the public support expressed for renewable energy and the suggestions for the appropriate policy approach for Ards and North Down. Public concern for renewable energy development within sensitive landscapes is noted, as was feedback from statutory consultees.
- The development of this approach will be informed by further engagement with consultees and a Review of Landscape Character Areas undertaken on behalf of the Council by Ironside Farrar which will be published alongside the Draft Plan Strategy.
- Further consideration of renewable energy will not be limited to wind energy, it will also include the potential of the Sherwood Aquifer.
- We note that DfI are currently reviewing regional strategic planning policy on Renewable and Low Carbon Energy.

Key Issue 5 – On-site renewable generation and reduced energy consumption in new development

Our Preferred Option – Option 5a: Introduce policy requiring applicants to demonstrate how the integration of on-site renewable generation and measures to reduce energy consumption have been considered and incorporated in all proposals for new development.

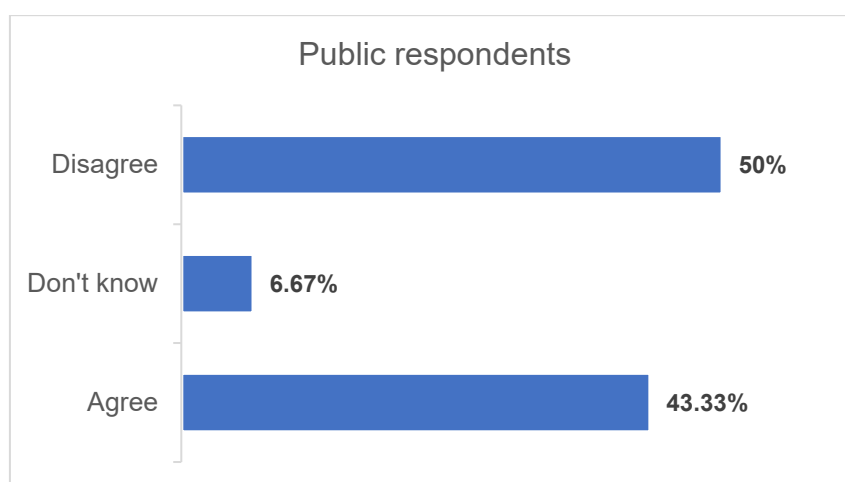
We Asked

Do you agree with the preferred option? 32 respondents



We Asked

Do you agree with the Council's approach that all new development proposals should demonstrate how the integration of on-site renewable generation and measures to reduce energy consumption have been considered and incorporated into the design? 30 respondents



Issues Raised

- There was public support for anything that encourages renewable energy generation. There were, however, some respondents who did not support preferred option 5a in line with prevailing policy which promoted the use of passive solar and renewable energy. They stated that the preferred option is an onerous policy stance with some statements that it would be impossible to 'monitor and police'.

- Others stated that the preferred option is the best of those considered, however, this proposal should go further and set minimum energy efficiency standards for all new homes and commercial premises and that developers should be required to adopt a 'fabric first' approach and ensure the highest standards of energy efficiency with renewables making up any further heating requirement.

Consultation Body Comments

- 2.29. DfI Planning welcomed the inclusion of the detailed information and proposal relating to on-site renewable generation, DfI also noted that this goes beyond the requirements of regional policy contained the Strategic Planning Policy Statement.
- 2.30. DfI Rivers advised that wind turbines should not be located in areas at risk from flooding as this can increase flood risk. While damage to turbines is unlikely, control equipment at ground level may be susceptible to flood damage leading to possible disruption of output. Hydroelectric power generation schemes can significantly increase flood risk, and the various weirs, channels and control structures require careful consideration. As Hydroelectric power generation schemes can completely alter the flow regime of a river, DfI Rivers advise against their siting within catchments with a flow gauging station.
- 2.31. The Department for the Economy (DfE) advised that it would be helpful if the Council could be very specific on 'inappropriate concentration' to ensure that there is no ambiguity.
- 2.32. The Northern Ireland Housing Executive strongly supports the use of renewable energy. They stated that they believe this will provide certainty to applicants and case officers and can be combined with a precautionary approach to avoid over concentration. The NIHE also agree with a cautious approach to renewable energy development within sensitive landscapes and believe that planning policy for renewable energy would be best incorporated within an energy strategy or energy masterplan.

- 2.33. The NIHE strongly supported the Council's approach that all new development proposals should demonstrate how the integration of on-site renewable generation and measures to reduce energy consumption have been considered and incorporated into the design. The Housing Executive believes the Plan Strategy provides an opportunity to promote energy efficient homes and buildings that can easily incorporate renewable energy technology, such as, heat pumps and solar panels. The NIHE advised that Council may wish to consider applying this policy to non-residential premises where the potential for energy savings and carbon reductions is significant.
- 2.34. The Forest Service (DAERA) agrees with the Council's approach and the Forest Service will accommodate the development of existing and emerging Programme for Government (PfG) outcomes that may require the release of land from forestry for renewable energy generation and environmental improvement projects.
- 2.35. Additionally, data from the Draft Woodland Register for Northern Ireland indicates that there is 15.5 ha of Short Rotation Coppice (SRC) within the Council area which is grown to provide a supply of biomass to the renewable energy market.

Consideration And Way Forward

- We welcome the range of views held for the incorporating of renewable energy into all new development. We note that for this topic, the views received had similar proportions of those in favour and those against.
- We will further explore the implications of on-site renewable generation and reduced energy consumption in new development and engage further with consultees.
- We do, however, note building regulations and that the LDP should not duplicate or conflict with these.

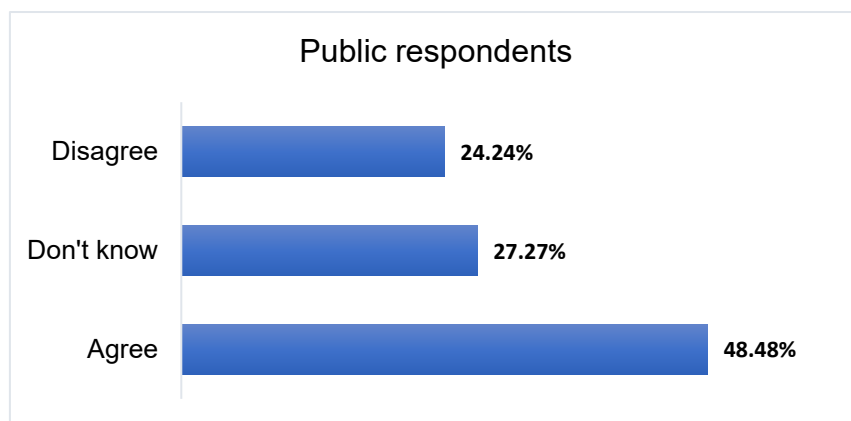
Key Issue 6-8 Urban Rural Housing

Facilitating Sustainable Rural Housing

Our Preferred Option – Option 6a: Introduce an approach to rural housing in line with existing policies and regional direction, tailored to meet local circumstances.

We Asked

Do you agree with the Preferred Option? 33 respondents



Issues Raised

- There was support for the retention of the existing approach to rural housing in line with existing policies and regional direction.
- There was support for restriction on rural housing. Respondents stated that it did not make sense to dot houses around the countryside on the periphery of larger settlements instead of putting them in established settlements with appropriate roads and services.
- There was support for additional protection for Strangford Lough and Lecale Area of Outstanding Natural Beauty (AONB) from inappropriately sited houses and cumulative impacts.

Consultation Body Comments

- 2.36. DFI Planning noted that the approach suggested would involve minor amendments and clarification of existing policy. The Council state that any changes to rural policy will be compliant with the regional strategic objectives set out in the Strategic Planning Policy Statement (SPPS). DFI Planning welcomed

this approach and noted the comments in relation to existing rural policy made in the preliminary policy review document. There is flexibility to bring forward proposals to address local issues within the framework established by strategic policy, however, this must be supported by the plan evidence base.

- 2.37. DfI Planning welcomed the evidence base presented in relation to the aim of achieving balanced communities. The information in relation to the Northern Ireland Housing Executive projected housing need is welcomed but it is noted that the need relates to the period 2017-2022. Further consideration should be given to exploring with NIHE whether a projection of social/affordable need can be provided over a longer period to align with the Local Development Plan.
- 2.38. DfI Water and Drainage Division stated that sustainable rural housing should incorporate appropriate wastewater treatment facilities, to ensure the local environment is not polluted.
- 2.39. DfI Rivers advised that any new development beyond a floodplain has potential to increase flood risk. Small rural developments and particularly single dwellings should not be located in areas known to be at risk of flooding, in addition they can have a cumulative effect in increasing flood risk. Any potential increase in flood risk should be avoided or mitigated against by suitable Local Plan Policies.
- 2.40. Northern Ireland Housing Executive (NIHE) supports the preferred option but stated that it did not support further relaxation of policies in the open countryside, as they believe that in order to achieve sustainable development, development should be directed to settlements.
- 2.41. NIHE believe that the LDP should aim to limit the growth of dispersed single dwellings in the countryside, stating that dispersed development in rural areas can isolate people, having a negative impact on their health, separating them from services and facilities and increasing a household's reliance on private cars. This is an especially significant issue in the context of an ageing society. NIHE also consider that housing allocations can assist sustaining and supporting rural communities, but that the LDP should seek to direct rural housing primarily

to within villages and small settlements and restrict development within the open countryside to prevent rural sprawl.

- 2.42. NIHE stated that they would like to see an exception policy similar to CTY5 of Planning Policy Statement 21 (PPS21) – ‘Sustainable Development in the Countryside’ to address instances of rising and unforeseen affordable housing need which cannot be met within the settlement limit in the rural area. They also advised that they would like to see the retention of the joint/DOE CTY5 Protocol (produced in 2010) to assist housing associations, NIHE and Council Planners in the implementation of rural exception policy for affordable housing.

Consideration And Way Forward

- We welcome the support shown for the approach for sustainable rural housing.
- Rural housing policy within the Draft Plan Strategy will be informed by the views expressed and engagement with statutory consultees.

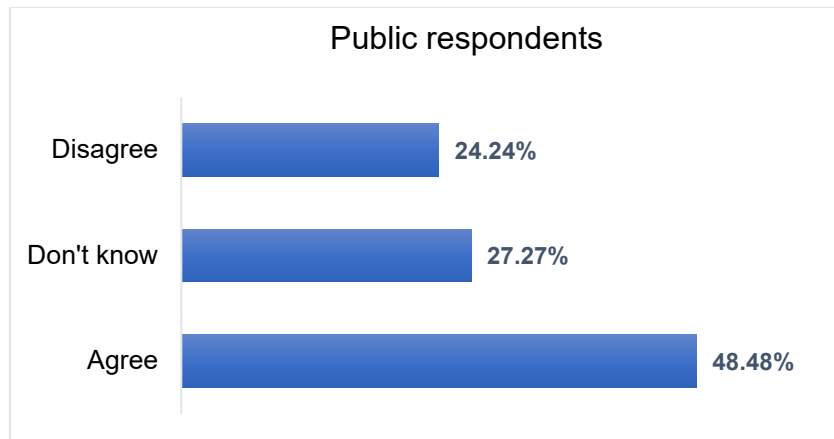
Key Issue 7 – Urban and Rural Housing

Facilitating Affordable Housing

Our Preferred Option – Option 7d: The Local Development Plan (LDP) will provide affordable housing through the use of the proportional approach, Key Site Requirements or zoning of entire sites, dependent on a number of factors, including identified need.

We Asked

Do you agree with the preferred option? 41 respondents



We Asked

Do you agree with the Council's preferred option for addressing affordable¹ housing need in the Borough? 30 respondents

Issues Raised

- Public respondents for the topic of affordable housing included concern that an affordable housing policy would negatively impact the amount of housing delivered.
- Questions were raised on the methodology that would be used.
- There was support for the intention of the Council to facilitate the delivery of affordable housing through the LDP.
- Comments opposed to affordable housing advised that the preferred option could result in land being zoned for social housing, however, the sites may not be where the need exists. There was also concern as to the amount of land needed and whether committed sites would be viable following the introduction of a requirement for affordable housing. Responses included the view that not all sites or developments are suitable for affordable housing.

¹ Affordable housing is:

- a) Social rented housing; or
- b) Intermediate housing for sale; or
- c) Intermediate housing for rent

that is provided outside of the general market, for those whose needs are not met by the market.

Affordable housing which is funded by Government must remain affordable or alternatively there must be provision for the public subsidy to be repaid or recycled in the provision of new affordable housing

- Respondents wished for clarification as to whether this preferred option concerns solely affordable housing or whether it is the Council's intention to also provide social housing under this policy.
- There was qualified support expressed by others. There was some confusion as to the definition of affordable, social and intermediate housing.

Consultation Body Comments

- 2.43. DFI Planning noted how the preferred option seeks to meet affordable housing need using a range of approaches including zoning land for affordable homes; Key Site Requirements; or a development management approach requiring a proportion of housing to be provided as affordable. The information presented in relation to possible thresholds and proportions was welcomed.
- 2.44. The Northern Ireland Housing Executive (NIHE) strongly agreed with the Council's preferred option for addressing affordable housing need in the Borough as it provides for three different methods of affordable housing provision which will contribute to the achievement of sustainable balanced communities. It should be noted the NIHE preferred option to deliver the majority of an affordable housing provision, is through a proportional approach however the identification of three approaches within the preferred option, will provide flexibility allowing the provision of affordable housing to be tailored to different circumstances and locations.
- 2.45. The delivery of intermediate housing in areas predominated by social housing can also lead to mixed tenure communities and contribute to regeneration within these areas.
- 2.46. NIHE would like the Plan Strategy to contain a policy for supported housing; for individuals who cannot live independently in their own home. They require extra housing support and/or an element of care in addition to a home. Accommodation can take the form of self-contained or shared accommodation. The term shared housing is used to describe accommodation for two or more persons with shared facilities e.g. bathroom, kitchen communal living area or

dining room. Shared housing can include cluster dwellings, group homes or hostels. Communal facilities are often a feature of this type of development. Some will provide the services of a warden who may be a resident in the scheme. NIHE would like to see Policy HS3 of Planning Policy Statement 12 (PPS12) – ‘Housing in Settlements’ or the Travellers policy within the Strategic Planning Policy Statement (SPPS) replicated within the Plan.

Consideration And Way Forward

- We welcome the range of views for affordable housing. We note the opposing viewpoints expressed by the public on this topic.
- We note that concerns were raised in terms of the potential impact of affordable housing on the wider housing market. Further research will be undertaken on suitable thresholds and percentage of affordable housing for Ards and North Down alongside additional engagement with statutory consultees.
- The DPS will contain provision for travelling community in line with the SPPS.
- We note the confusion on the meaning of affordable housing and confirm that the definition¹ of affordable housing is defined as:
 - a) Social rented housing; or
 - b) Intermediate housing for sale; or
 - c) Intermediate housing for rent;
- which are provided outside of the general market, for those whose needs are not met by the market. Affordable housing, which is funded by Government, must remain affordable or alternatively there must be provision for the public subsidy to be repaid or recycled in the provision of new affordable housing.

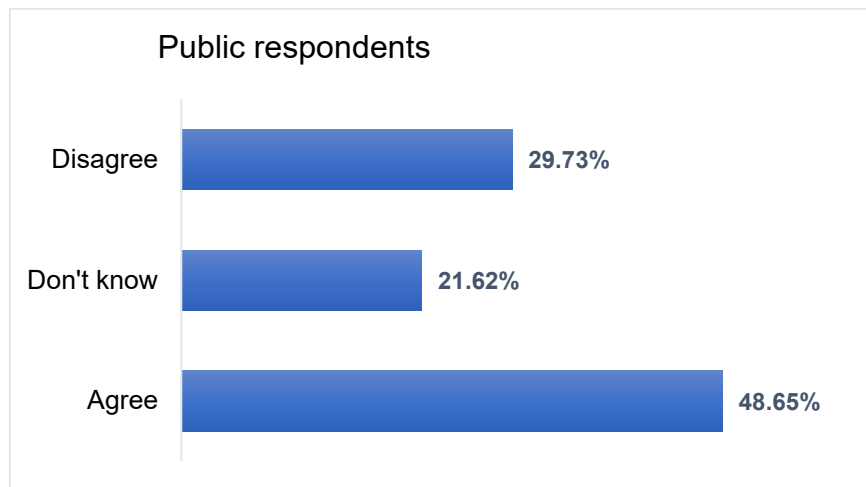
Key Issue 8 – Urban and Rural Housing

Facilitating the delivery of Lifetime Homes

Our Preferred Option – Option 8a: The Local Development Plan (LDP) shall provide a proportion of Lifetime Homes in new developments.

We Asked

Do you agree with the preferred option? 37 respondents



We Asked

Do you think the LDP should direct a proportion of Lifetime Homes to be included in new development? 25 respondents

Issues Raised

- Support was expressed for the requirement that all new developments to be built to Lifetime standards.
- Housing that is bespoke to specialist needs would free up other forms of housing for families etc.
- Concerns have been raised at the potential cost to provide Lifetime Homes, which in turn will increase the value of existing (non-lifetime) homes.
- A developer expressed the view that they would prefer to have the discretion to make this decision themselves on the proportion or nature of Lifetime Homes.

Consultation Body Comments

- 2.47. DfI Planning welcomed the policy approaches that support the Strategic Planning Policy Statement objectives of supporting the delivery of homes to meet the full range of housing needs and contribute to balanced communities. DfI suggested the Council liaise with the Building Regulations Unit of the Department for Finance (DfE). The Council should also demonstrate that regard has been had

to the implications of the approach for development viability. This should also consider the costs associated with the later adaption of non-Lifetime Home standard housing. Council should also consider the viability implications of the approach in combination with the requirements in respect of affordable housing.

- 2.48. DfI Rivers advised that any new development beyond a floodplain has potential to increase flood risk. Developments, particularly those for vulnerable groups such as the elderly, those coping with illness or dealing with reduced mobility, should not be located in areas known to be at risk of flooding. Any potential increase in flood risk should be avoided or mitigated against by suitable Local Plan Policies.
- 2.49. The Northern Ireland Housing Executive welcomed the reference to Lifetime Homes but would like to see all new build homes built to these standards, with a proportion built to wheelchair standards.
- 2.50. Lifetime Homes are flexible, designed to create better living environments for everyone, from raising children, coping with illness or dealing with reduced mobility in later life, allowing people to remain independently for longer in their own homes. The development of homes within these standards is especially important in the context of an ageing population and can prevent the need for costly and disruptive adaptations. Housing Associations already cater for identified wheelchair need in their social housing planning applications. However, demand from people with a disability who wish to own their own homes, or rent privately, cannot readily be met, as there is no requirement for market housing to provide wheelchair accessible homes. The Housing Executive would like to see the Local Development Plan ensure that a minimum of percentage of private units within developments are designed to be wheelchair accessible, for residents who are wheelchair users.
- 2.51. NIHE further advised that as the proportion of older households increase, so will the proportion of the population with a disability, accessibility and mobility requirements, and that most existing housing stock does not meet the needs of people as they become frailer. A major obstacle to downsizing or 'right sizing' is

a lack of suitable housing options with access to good transport links and key services.

Consideration And Way Forward

- We welcome the general support for Lifetime Homes, we also note that queries were expressed on the application of this approach and possible implication on housing costs and the possible overlap between this and possible building control regulation changes.
- We will further explore the potential impact of all the criteria for Lifetime Homes and also any overlap between Building Control Regulations.
- We will engage internally and also with statutory consultees on the most appropriate way forward for the Borough.

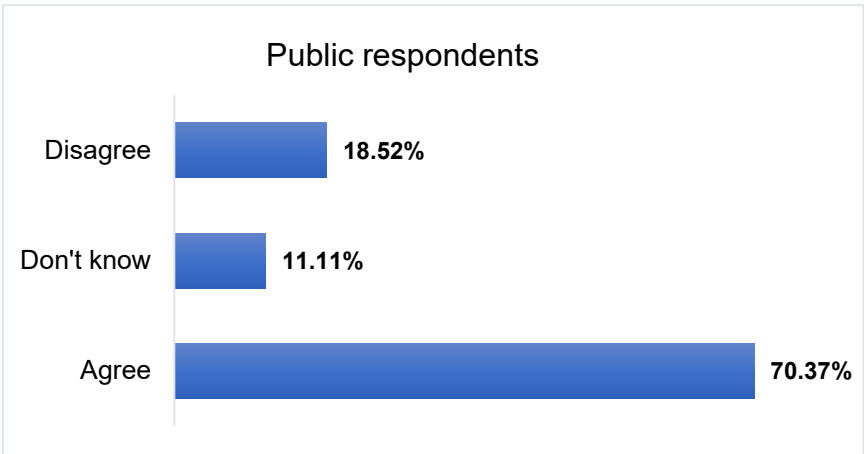
Key Issue 9 - 10 – Open Space, Sport and Outdoor Recreation

The Protection of Existing Areas of Open Space

Our Preferred Option – 9b: Protect existing open space, re-evaluate existing open space zonings and provide new areas of open space.

We Asked

Do you agree with the preferred option? 27 respondents



We Asked

Do you think that ‘exceptional circumstances’ should be considered on a case-by-case basis, or should the Local Development Plan (LDP) specify those instances in which it will apply? 21 respondents

Issues Raised

- There was support expressed for protecting and expanding open space. There was also a desire for clarification on the meaning of ‘exceptional circumstances’.
- Concern was expressed that if the LDP listed exceptions, that they will be used by developers, lawyers etc., to reduce the effectiveness of any policy.
- Confusion was expressed at protecting open space and providing consideration for the development of the land for alternate uses.

We Asked

Should the existing open space zonings be re-evaluated to allow for possible development as another use? 20 respondents

Issues Raised

- Mixed opinions were received for this question. There was support expressed for a re-evaluation for the purpose of protecting open space and also in cases where land is not being maintained and should be brought into a different use.
- There was recognition of the value of open space for biodiversity and a desire for more allotment spaces within the Borough. Many respondents commented that, no matter how small, open spaces can provide value for residents and wildlife. There was also recognition that it can act as important stepping stones (or connectors) to other areas of open space, and this is vitally important given the declines in urban wildlife.
- There was also opposition to the re-use of open space for a different purpose. It was expressed that there is insufficient open space in most developments in the Borough. It was suggested that, where the Council to re-evaluate open space on ground sold for building, there should be compensation for the loss.

Consultation Body Comments

- 2.52. DfI Planning acknowledged that the preferred option 9b reflects the requirements of the Strategic Planning Policy Statement. However, suggested that in relation to re-evaluating existing open space, the Council should ensure that any exception to the general presumption against the loss of open space should only be appropriate where it is demonstrated that redevelopment would bring substantial community benefit that outweighs the loss of the open space, or where it is demonstrated the loss of open space will have no significant detrimental impact. The Department queried whether any loss of 'open space' land would be reallocated elsewhere, after the evaluation.
- 2.53. DfI Water and Drainage Division advised of the potential use of open space to help resolve flooding issues and the potential to create more open amenity space and promote health and wellbeing through the introduction of Sustainable Drainage Systems (SuDS).
- 2.54. Natural Environment Division (NED) welcomed the presumption against the loss of open space. Where exceptional circumstances are considered, they suggested that policy should insist on compensation through the provision of new open space so that there is no net loss of biodiversity, amenity, flood retention etc. NED also suggested that policy should address circumstances where open space provides 'multiple' services such as flood retention, biodiversity value, recreational facilities and greenway linkages etc. NED advised that the test for exceptional circumstances should be set higher than for open space that may only provide, for example, recreational value alone.
- 2.55. DfI Rivers stated that recreation facilities for vulnerable groups such as children or the elderly should not be constructed in areas at risk of flooding. Some developments connected with sports facilities, such as, changing rooms but not club houses or social clubs, may be located within floodplains provided suitable mitigation measures are provided.
- 2.56. NIHE supported the preferred option and welcomed the revaluation of existing open space particularly within large estates, that can deliver positive effects in

terms of estate restructuring, reductions in anti-social behaviour and meet high levels of housing need. NIHE strongly supported the statement, which recognises that the development of a small proportion of open space could meet affordable housing needs.

Consideration And Way Forward

- We welcome the support for the review of Open Space designations and advise that this will be undertaken at Local Policies Plan stage following detailed consideration.
- The general appreciation of the value of open space is welcomed and the variety of ways that open space is valued is also noted, ranging from the appreciation of open space for recreation and wellbeing, and the value for nature through biodiversity.
- The application of the Memorandum of Understanding that existed between NIHE and Department of the Environment (Northern Ireland) will continue to be relevant.
- We will address concern about the application of 'exceptional circumstances' within future open space policy, and through continued engagement with statutory consultees including the NIHE.

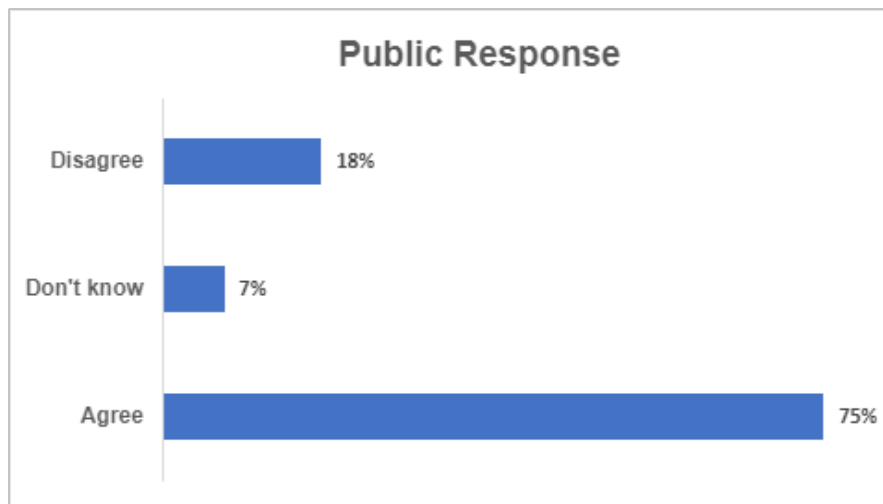
Key Issue 10 – Open Space, Sport and Outdoor Recreation

Community Greenways

Our Preferred Option – 10: Identify and facilitate the development of Community Greenways.

We Asked

Do agree with the Council's approach to Greenways? 28 respondents



Issues Raised

- There was strong support for greenway development and expansion. The provision of green infrastructure and community space was described by some respondents as critical in promoting active travel and providing a shared space. It was suggested that developer contributions could help support the development of greenways. There was a desire for greenways to be adequately lit and ensure they are as safe as possible using the 'one path' approach along with adequate resources allocated for clean-up, engagement with community groups and users, tackling anti-social behaviour, bin provision and emptying and maintenance.
- Greenways were favoured as they will improve accessibility, access to open green spaces and services, improve health and wellbeing by encouraging active travel and reduce dependency on private transport which in turn will reduce energy consumption and CO₂ emissions.
- Respondents recognised that greenways could connect existing sites of biodiversity value and make them more resilient and that the Local Development Plan should also provide a policy to protect these important link corridors. There was particular support for the safety of cyclists from motor vehicles on public roads. Comber Greenway was viewed to have been successful. The use of existing public paths etc (e.g. the Clandeboye Way) should be pursued, as these offer the greatest long-term benefit for the Borough population as a whole.

- A counter view was expressed where greenways were described as overambitious and impractical, that it is presently unsafe and impractical for people/cycles and cars to comfortably share the same space.

Consultation Body Comments

- 2.57. DfI Rivers advised that community greenways such as the Connswater Community Greenway in East Belfast demonstrates how works of this nature can incorporate flood alleviation measures.
- 2.58. The Northern Ireland Housing Executive (NIHE) agreed with the policy approach to identify and facilitate the development of Community Greenways. The Housing Executive advised that they welcome Greenways, which support active travel, and can improve health and wellbeing. Disused transport routes or community greenways offer the opportunity to connect people and places in more sustainable ways, promoting cycling and walking and contributing to healthier lifestyles. NIHE wished to see the Council work with adjacent Councils to ensure that, where opportunities exist, greenway linkages across Council boundaries are facilitated.
- 2.59. The Forest Service (DAERA) welcomes the proposal to identify potential new greenways and protect the identified existing greenways in order to provide a network of linkages between open space areas. Due to their location and length, greenways typically include a woodland element. Within the Ards and North Down Borough Council area potential exists to create new greenways with considerable woodland components. This potential has been recognised in the design of the proposed greenway between Newtownards and Helen's Bay, specifically the route of Section 3 between the Somme Museum and Crawfordsburn Road which passes through Clandeboy Forest (managed by Forest Service).

Consideration And Way Forward

- We welcome the support for greenways which bring a variety of benefits from safety for cyclists and encouraging active travel and connectivity across and outside the Borough.
- We note that the route of and the development of greenways requires extensive community engagement.
- We will engage within the Council on the latest developments and with statutory consultees to ensure that the Local Policies Plan (LPP) contains the latest information for the Borough.

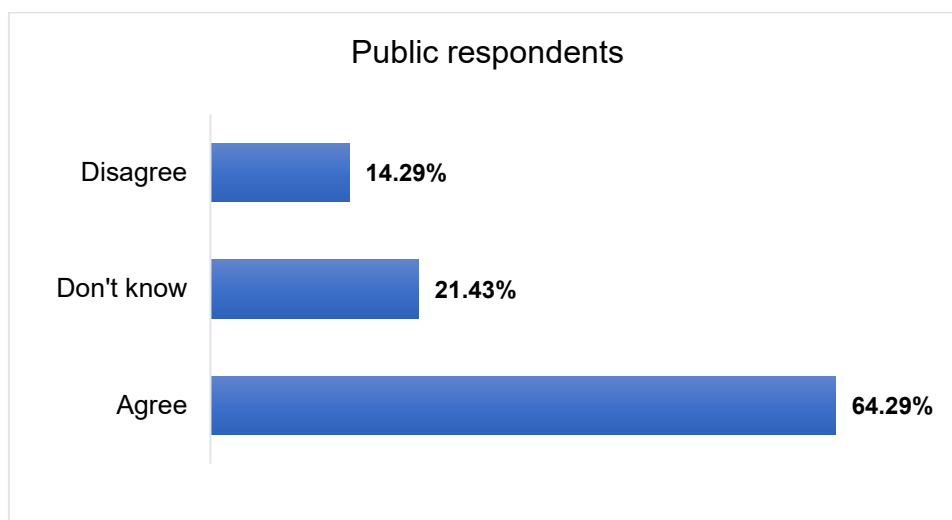
Key Issue 11-13 Public Services, Health and Wellbeing

Facilitate the needs of the Borough in respect of Health, Education and other Public Services and Facilities.

Our Preferred Option – Option 11c: Identify and safeguard lands to meet the anticipated needs of the community, in terms of health, education and other public services and facilities. Complementary policy in relation to proposals on un-zoned sites and in relation to developer contributions will also be introduced.

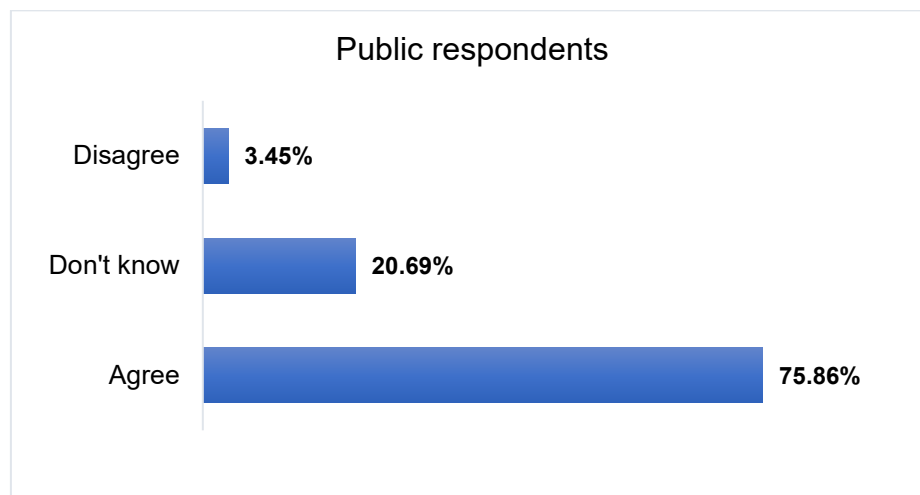
We Asked

Do you agree with the proposed option? 28 respondents



We Asked

Do you agree with the Council's approach to identify and safeguard lands to meet the anticipated needs of the community, in terms of health, education and other public services and facilities? 30 respondents



Issues Raised

- Support was expressed for the provision of health, education and other public services.
- Respondents advised that Council should be aware that there may be an opportunity to help meet the educational needs of the Borough by zoning land within or adjacent to new housing zonings.
- It was suggested that Ballyhalbert has a lack of leisure or fitness facilities.
- A number of respondents advised that land could be allocated to allow for the expansion of Towerview Primary School.

Consultation Body Comments

- 2.60. DfI Planning welcomed clarification that the Council will engage with relevant bodies and service providers to determine the need for additional facilities so land can be identified and protected in the Local Development Plan (LDP).
- 2.61. NIHE supported the Preferred Option 11c, they would however, also like to note that beneficial health outcomes are not only supported by development and

access to health facilities, but can be supported by the form of development, inclusive design in homes, buildings and surrounding places, dedicated spaces for active travel and access to open space. The Housing Executive also recognises the importance of considering health as part of the planning process and that health impacts are considered in policy formulation. NIHE would like to see a Plan Strategy contain a core principle to integrate planning and health.

Consideration And Way Forward

- We welcome the strong support shown for the preferred option regarding health, education and other public services and facilities.
- We will continue to engage with consultees and the relevant bodies to ensure that the appropriate land is identified and protected at Local Policies Plan (LPP) stage.

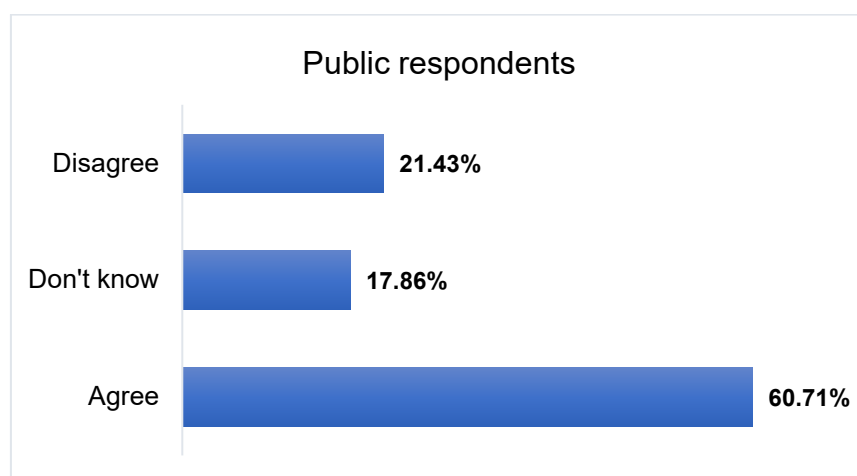
Key Issue 12 – Public Services, Health and Wellbeing

Improving Health and Wellbeing in the Borough.

Our Preferred Option – Option 12a: Introduce policy to address a proliferation of hot food takeaway uses within centres and to prohibit hot food takeaways within 400 metres of school boundaries.

We Asked

Do you agree with the preferred option? 28 respondents



We Asked

Do you consider the preferred Option is appropriate? 18 respondents

Issues Raised

- Support was expressed for the restriction of hot food takeaways. It was also questioned whether it was the role of the Local Development Plan (LDP) to determine food choice for children.
- There were also queries on how it would work in practice, including-
 - It's parents' responsibility to ensure children eat healthily why punish businesses.
 - Does the Council propose to close down existing hot food outlets near schools?
 - Does this not seem unduly harsh on small local businesses?
- Consideration needs to be given to the appropriateness of a 400 m limit in a small town or villages, where this would prohibit any hot food takeaways within the settlement.

We Asked

Are there any other ways the LDP can help contribute to improving the health and wellbeing of our residents? 18 respondents

Issues Raised

- There were a wide range of suggestions for improving the health and wellbeing of residents. This included encouraging people out of the house and into the green areas promoting sustainable transport.
- Travel cards should be provided for a minimum of 10 years to allow for the complete construction of the development and to ensure the public transport is incentivised in the long term. It is important the LDP encourages active travel by ensuring that residential and retail developments are designed with a view to facilitating pedestrians and cyclists.
- Tree planting and plenty of provision of outside green space is necessary.
- An air pollution strategy should be formulated with Council and achieved, in part, through the LDP provisions.

- Materials used in new builds should also form part of our LDP through sustainable construction strategies.
- There should be a requirement for e-car charge points to be put into all new developments.
- Developers should contribute to the environmental costs associated with takeaway food.
- Provision of safe routes for cycling and walking to schools and actively discouraging parents and grandparents from driving up to the school gates, often leaving engines idling while waiting to pick up children.
- Developing a strategy to improve air quality in urban areas.
- Banning any development of large-scale factory farming.
- The plan should ensure it protects and provides access to a certain amount of open space within easy reach of residents and workers.

Consultation Body Comments

- 2.62. DfI Planning suggested that the Council may wish to demonstrate that they have considered other likely effects of such an approach, for example, upon retail policy and vacancy rates in centres.
- 2.63. NIHE expressed support for this option stating that they believe this policy will encourage the health and wellbeing of local people, especially for children and young people.

Consideration And Way Forward

- We welcome the range of views both for and against a possible restriction of hot food takeaways in proximity to schools in the Borough.
- We particularly note that whilst there was support, there were also questions raised as to the application of a restriction and also whether it was an appropriate use of the Local Development Plan (LDP).
- Further consideration will be given to all viewpoints raised and further engagement with statutory consultees.
- We note that some of the suggestions are outside the scope of the Local Development Plan.

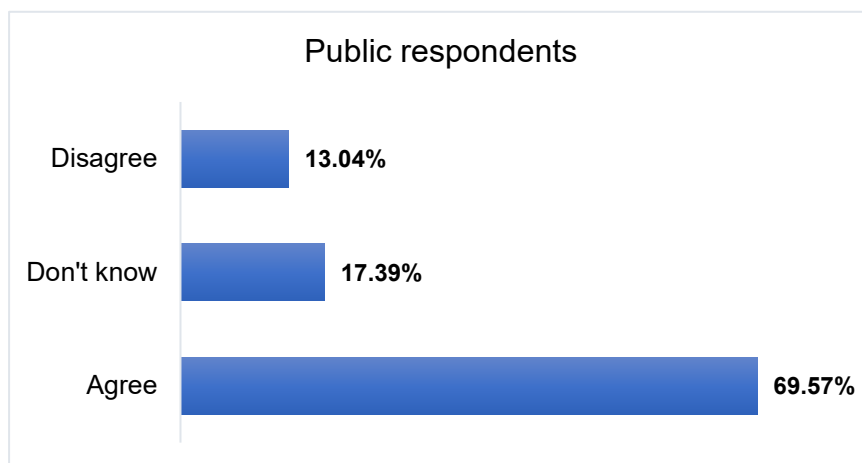
Key Issue 13 – Public Services, Health and Wellbeing

To facilitate Development of Utilities and Telecommunications without compromising the Natural Environment of the Borough.

Option 13: Adopt approach to utilities and telecommunication development in line with regional policy – ensuring the applicant provides detailed information on mitigation measures to ensure the visual and environmental impact of development are minimised.

We Asked

Do you agree with our proposed approach to encourage mitigation measures to be included with any public utility planning applications? 23 respondents



Issues Raised

- Respondents advised that in terms of telecommunications, it is important that Council not only considers the impact of individual applications but also takes account of cumulative impacts.
- Early dialogue with other utility providers could lead to a co-ordinated effort in areas where infrastructure is proposed.
- There was support that trees or shrubbery should not be removed to facilitate telecommunications upgrades. There should be integration with the local environment especially in those areas that are of importance, i.e., protected

areas or conservation areas. There was also support for on-site mitigation measures to minimise the impact of any infrastructure.

- Concern was also expressed that ‘mitigation’ measures are not disproportionately prohibitive to the extent it would slow down or prevent the roll out of important infrastructure to rural communities.

Consultation Body Comments

- 2.64. DfI Planning stated that whilst the Council considers that better connectivity within the Borough aids businesses and the economic prosperity of the area, and contributes to the health and wellbeing of residents, it also recognises that those public utilities (and related infrastructure) can also be associated with negative impacts.
- 2.65. DfI Rivers stated that infrastructure, telecommunications and utilities should not be considered in areas known to be at risk from flooding, or in areas benefiting from a designated flood defence as access and uninterrupted operation cannot be guaranteed in these locations where a residual flood risk remains.
- 2.66. The Department for the Economy (DfE) advised that the UK Government and Westminster Parliament are responsible for setting the overall policy and regulatory framework for telecoms and that Ofcom, as the UK’s independent regulatory authority, is responsible for implementing the framework, and for making regulatory decisions under its statutory duties.
- 2.67. There are future proposals for the development of a Digital Infrastructure Strategy as outlined in the Draft Industrial Strategy for Northern Ireland, however, this is at a preliminary stage in development. Project Stratum has been developed in response to the opportunity presented by the Confidence and Supply Agreement between the Conservative Party and the Democratic Unionist Party following the General Election in June 2017, which promises £150m to help improve the availability of high-speed broadband in Northern Ireland.
- 2.68. Cornerstone Vodafone suggested planning policy text for inclusion in the Local Development Plan (LDP) Strategy which prioritises better mobile connectivity.

- 2.69. The Northern Ireland Housing Executive (NIHE) agreed with the proposed approach and suggested that developer contributions could help secure infrastructure improvements.
- 2.70. NI Electricity Networks (NIE) suggested that any associated policy needs to build in an element of reasonable flexibility to allow the planning authority to exercise reasonable and appropriate planning judgement in weighing up proposals.
- 2.71. System Operator for Northern Ireland (SONI) suggested policy to protect strategic transmission infrastructure provisions to ensure development in close proximity to existing electricity infrastructure does not compromise or curtail future network operations/expansion.

Consideration And Way Forward

- We welcome the comments received regarding telecommunications; we note the need to include mitigation measures and flexibility alongside the provision of public utilities including telecommunication connectivity across the Borough.
- We will continue to engage with statutory consultees in the development of appropriate policy for the Borough.

Key Issue 14-15 Public Utilities

Cemetery Provision

Our Preferred Option – Option 14a: Identify and safeguard specific locations in the Borough for new or extended cemetery and other end of life development based on projected need and capacity over the Plan period with a complementary policy in relation to proposals on un-zoned sites.

We Asked

Do you agree with our proposed approach to safeguard specific locations for end-of-life development within the Borough? 10 respondents

Issues Raised

- Support was expressed for a crematorium in the Borough.
- Comments received also highlighted the need for a detailed list of policy criteria to be applied to avoid any significant adverse effects on the natural or built environment.
- Such end-of-life developments should also be encouraged to provide opportunities for enhancing biodiversity which would contribute to the wellbeing of people visiting cemeteries.
- There was support for Council to consider encouraging green burials including burial practices that do not use up as much space, and also tree planting provision for the bereaved family.

Consultation Body Comments

- 2.72. DfI Planning stated that while the evidence suggests cemetery provision for the majority of areas has adequate provision, this is not the case across the Borough, in particular additional provision is anticipated for Ballyvester, Movilla and Greyabbey over the Plan period.
- 2.73. DfI Rivers advised that cemeteries should not be considered in areas known to be at risk from flooding. Any potential increase in flood risk should be avoided or mitigated against by suitable Local Plan Policies (LPP).
- 2.74. The Northern Ireland Housing Executive (NIHE) agreed with the proposed approach and stated that they believe that developer contributions could help secure infrastructure improvements.

Consideration And Way Forward

- We welcome the support expressed for the preferred option.
- The Council will provide additional grave and burial provision to meet the needs of the Borough as required.
- The Local Development Plan (LDP) will indicate the location of future burial space provision using the information available.

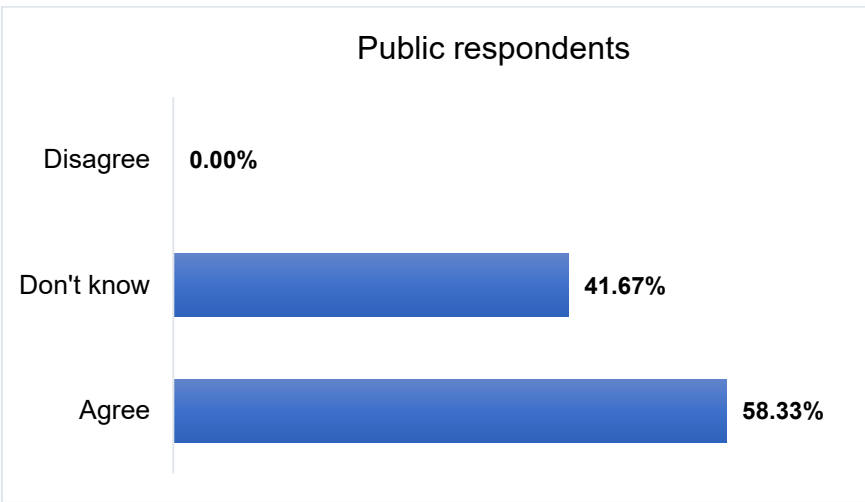
Key Issue 15 – Public Utilities

Facilitating Sustainable Waste Management.

Our Preferred Option – Option 15a: Identify and safeguard appropriate lands to meet the anticipated needs of the Borough in relation to waste management facilities (including recycling and WWTWs). Complementary policy in relation to waste management proposals on un-zoned sites will be introduced.

We Asked

Do you agree with the preferred option? 24 respondents



We Asked

Do you agree with our proposed approach in line with the Waste Management Strategy? 11 respondents

Issues Raised

- There was opposition expressed by respondents to incineration.
- There was support for the use of anaerobic digestion for organic household waste.
- The need for the reduction of waste, as per the waste hierarchy, was agreed with a particular emphasis on the reduction of single use plastics.

Consultation Body Comments

- 2.75. DfI Planning notes the approach and preferred option as set out by the Council, however, would welcome further consideration of regional direction as set in para 6.313 of the Strategic Planning Policy Statement (SPPS) when developing sustainable waste policies for the Draft Plan Strategy (dPS).
- 2.76. DfI Rivers stated that waste management infrastructure should not be located in areas which are prone to flooding, or in areas benefiting from a designated flood defence where environmental pollution is likely to occur in locations where a residual flood risk remains. By their nature Wastewater Treatment Works tend to be located adjacent to a watercourse and often within a flood plain if so, these developments will require a valid exception to policy and a flood risk assessment that details suitable mitigation measures and demonstrates that the proposed development does not increase flood risk elsewhere or give rise to environmental pollution during a flood event.
- 2.77. The Northern Ireland Housing Executive (NIHE) agreed with the proposed approach set out and believe that developer contributions could help secure infrastructure improvements.
- 2.78. The Regulation Unit (DAERA) stated that they agreed with Preferred Option 15a. They noted that the Preferred Options Paper (POP) did not identify how the Borough will manage land affected by contamination. It was suggested that whilst there are some brief comments relating to brownfield sites, however, there is no specific 'key issue' on the topic. It was suggested that specific policies should be considered linked to land contamination. Should Part III of the Waste and Contaminated Land (Northern Ireland) Order 1997 be enacted then this would place increased roles and responsibilities on the Borough in relation to contaminated land.

Consideration And Way Forward

- We welcome the support expressed for the preferred option. We also acknowledge that in responses to this topic there was a considerable number of respondents who responded "don't know". We will consider how to communicate

information for this topic within the Draft Plan Strategy (dPS) and Local Policies Plan (LPP).

- The POP is a document to communicate key issues rather than all issues.
- We will consider the consultee advice regarding additional policy for land subject to contamination.
- We will continue to engage with consultees and internally within the Council to ensure that the evidence base is clearly understood.

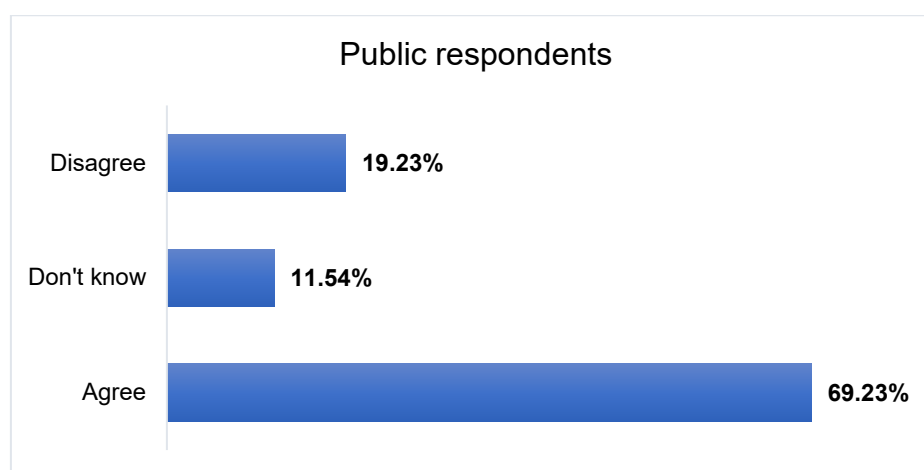
Key Issue 16-18 Coastal Management

The Undeveloped Coast.

Our Preferred Option – Option 16a: Designate an Ards and North Down Coastal Area within which development will be restricted.

We Asked

Do you agree with the preferred option? 26 responses



Issues Raised

- There was support for a co-ordinated and wholistic approach to the management of the coastline in these areas and this approach should be promoted across the adjacent Council areas.
- Respondents were cognisant of climate change advising that it is one of the most pressing challenges facing our society.

- The Local Development Plan (LDP) was viewed as an opportunity to identify and implement opportunities to build resilience into the built and natural environment and to develop and implement sustainable strategies to explore, address and manage significant flood risk.
- There was support for the retention and extension of the BMA coastal area, were respondents stated that it will provide appropriate protection for the coastal landscape, important views and vistas, built and natural heritage assets and the marine ecosystem.
- Some respondents did however note that the Ards and North Down Borough Council area is already subject to multiple designations. Concern was expressed about possible confusion posed by an additional designation.

Consultation Body Comments

- 2.79. DfI Rivers advised that any development within the 1 in 200 years (0.5%AEP) plus climate change coastal flood plain must be compliant with paragraphs 6.106 to 6.111 of the Strategic Planning Policy Statement (SPPS).

Consideration And Way Forward

- We welcome the strong support expressed for the designation of an Ards and North Down Coastal Area.
- We will consider a designation which will be the product of further engagement with statutory consultees and neighbouring Councils. This statutory designation with accompanying policy will be presented within the Draft Plan Strategy (dPS).

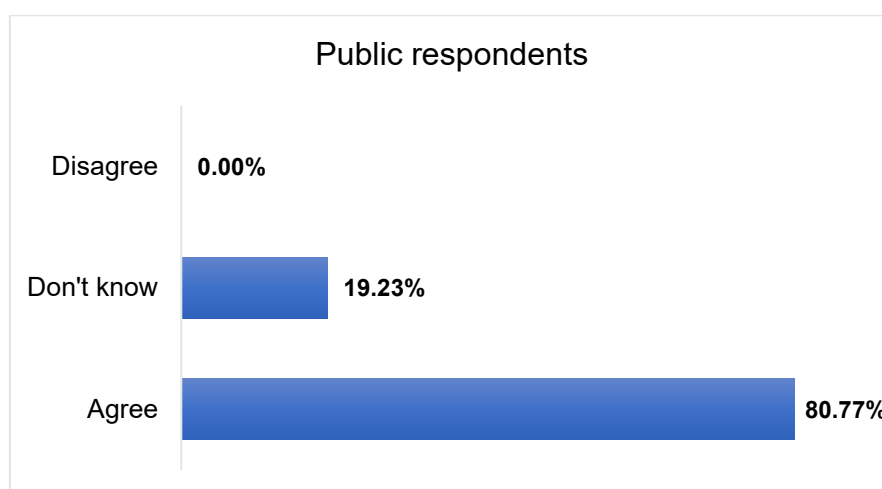
Key Issue 17 – Coastal Management

The Developed Coast.

Our Preferred Option – Option 17a: Designate urban waterfronts throughout key coastal settlements in the Borough in order to promote their regeneration and enhancement for tourism and recreation purposes.

We Asked

Do you agree with the preferred option? 26 respondents



We Asked

Are there any settlements in Ards and North Down in addition to Bangor which should have a designated Urban Waterfront? If so, which settlements? 15 respondents

Issues Raised

- Supportive comments were expressed for Urban Waterfronts, but there were queries as to how Council would define Urban Waterfront areas.
- Concern was also expressed around adequate infrastructure and environmental protection for the Lough and coastal beaches.
- There was a desire to protect the environment from inappropriate development.
- The need for facilities for storage at Portaferry and access for locals and visitors to use was expressed.
- Designated Urban waterfront location suggestions included Donaghadee, Millisle, Ballywalter, Portaferry, Kircubbin, Holywood, Whiterock, Cloughey, Ballyhalbert, Portavogie, and Groomsport.
Groomsport, Portaferry, Donaghadee and Millisle received multiple mentions.

Consultation Body Comments

- 2.80. DFI Planning advised that further work is being taken forward which will assist in the formulation of policies and proposals and that this is a developing knowledge area.

- 2.81. The Department noted that the preferred option is to extend the designated coastal area contained in the Draft Belfast Metropolitan Area Plan (dBMAP) 2015, to include the remainder of the Ards and North Down coast. It is proposed that this would provide appropriate protection for the coastal landscape, important views and vistas, built and natural heritage assets and the marine ecosystem with scope provided for regionally significant proposals that have to be located in the coastal zone. This approach was welcomed.
- 2.82. The Department stated that they would welcome clarification on the policy approach to the wide range of uses along the developed coast, such as the fishing industry and other economic development uses including tourism and infrastructure.
- 2.83. Natural Environment Division (NED) agree with the preferred option in principle subject to boundary selection and note that improved and enhanced access to the coastal area should not be at the expense of the landscape or natural heritage interest.
- 2.84. DfI Rivers stated that any development within the 1 in 200 years (0.5%AEP) plus climate change coastal flood plain must be compliant with paragraphs 6.106 to 6.111 of the Strategic Planning Policy Statement (SPPS).
- 2.85. Northern Ireland Housing Executive (NIHE) supports approaches which protect coastal and marine areas and allow equal access to the public.
- 2.86. Marine and Fisheries Division (MFD) stated that there was limited reference to the UK Marine Policy Statement (MPS) and marine aspects within the Council's Preferred Options Paper (POP). As a result, it is not clear how the legal requirements of Section 8 under the Marine Act (Northern Ireland) 2013 (MANI) and Section 58 under Marine and Coastal Access Act (2009) (MCAA) have been applied.

- 2.87. As presented, the UK MPS is currently only mentioned in the Coastal Management section of the POP under the Regional Development Strategy heading of the Regional Policy Context section. Detailed and specific reference to the UK MPS within the Regional Policy Context of the initial sections of the POP and relevant Policy Context sections associated with the various policy areas of the LDP is strongly advised.
- 2.88. Given the legal requirements above, the Council is advised to document how it has had "regard" to the UK MPS in the development of each of the options of the POP and subsequently in the policies and proposals in the Draft Plan Strategy (dPS).
- 2.89. Marine and Fisheries Division (MFD) consider that the options paper should include a requirement to explore alternatives to hard engineering and encourage innovative and sustainable development design which will co-exist and accommodate a changing coastline and allow natural processes to take place.
- 2.90. The Marine Conservation and Reporting team stated that in areas where there is 'existing coastal defence infrastructure in place', particular attention should be paid to the viability of repairing or re-instating these structures. The fact that sea defences are already in place suggests that erosion is a historical issue at the site and the existing measures may already be having a negative impact on marine and terrestrial habitats and hydrographic processes both at and beyond the site in question.

Consideration And Way Forward

- We welcome the strong support for this Preferred Option and the number of locations suggestion as possible Urban Waterfronts.
- We will identify the location and extent of Urban Waterfronts where appropriate at Local Policies Plan (LPP) stage following further evidence gathering and engagement with statutory consultees.
- The value of Urban Waterfronts to tourism and the economy in general will also take into account potential impacts on the coast and wider natural environment.

- Consideration will also be given to the draft Marine Plan within the dPS.

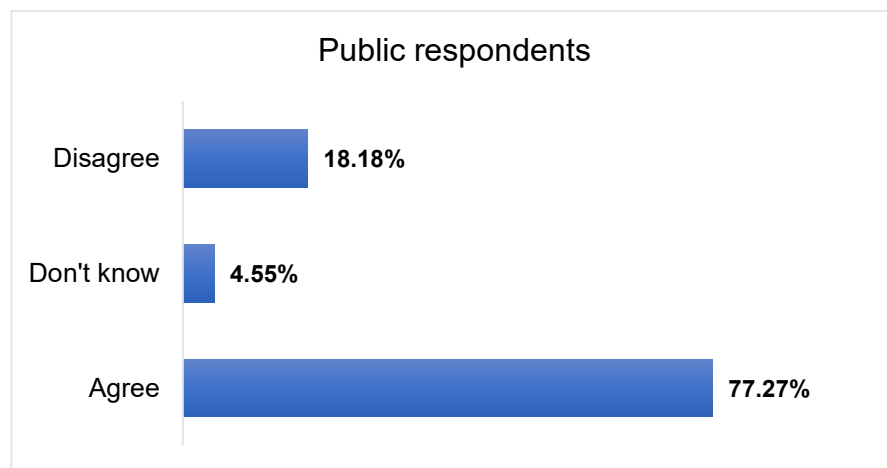
Key Issue 18 – Coastal Change

Coastal Change

Our Preferred Option – Option 18c: Identify areas of existing and potential coastal erosion and land instability (subject to data being available) where there will be a presumption against development except in exceptional circumstances.

We Asked

Do you agree with the preferred option? 22 responses



Issues Raised

- There was a strong desire to see more information as the data currently available is insufficient to develop the necessary Coastal Erosion Vulnerability Mapping.
- There was also a desire to see areas of the coast known to be at risk from flooding, coastal erosion, or land instability spatially defined within the Local Development Plan (LDP).
- Concern was expressed as regards to coastal defences – respondents stated that coastal defences cannot always be the default solution and working with nature rather than against could produce better outcomes.

Consultation Body Comments

- 2.91. DFI Planning noted that the Council's preferred option is to operate a presumption against development on sites that are likely to exacerbate a known erosion or land instability risk, and that that it will permit some exceptions, for example developments that can demonstrate a need for a coastal location or where there is existing coastal defence infrastructure in place. It was suggested that LDPs should identify areas of the coast known to be at risk where new development should not be permitted (paras 6.42 and 6.46 of the SPPS).
- 2.92. Therefore, the Council's proposed approach does not fully reflect Strategic Planning Policy Statement (SPPS) policy, and Council should have evidenced justification for its approach. The Department notes in relation to the developed coast, that coastal flooding is not addressed, and this should be included when drafting policies for inclusion in the Draft Plan Strategy (dPS).
- 2.93. Northern Ireland Housing Executive (NIHE) expressed support for the approaches which protect coastal and marine areas and allow equal access to the public. The Housing Executive supports this precautionary approach which will help protect development and communities.
- 2.94. Department for the Economy (DfE) Minerals and Petroleum Branch supports Preferred Option 18c since it is proactive in identifying areas of existing and potential coastal erosion and land instability. DfE welcomes the fact that whilst there is a presumption against development, some proposals can be approved in exceptional circumstances. They advised that there may be limited information available to assist in identifying areas at risk. In such cases, the developer should carry out an assessment as part of the planning application. The assessment should consider the risk over the lifespan of the development and any mitigation measures.
- 2.95. DfI Rivers advise that any development within the 1 in 200 years (0.5%AEP) plus climate change coastal flood plain must be compliant with paragraphs 6.106 to 6.111 of the SPPS.

Consideration And Way Forward

- We are grateful for the supportive responses to the protection of identified areas of coastal erosion.
- We will use the most up to date information for this developing area of understanding. DfI and the Department for Agriculture, Environment and Rural Affairs (DAERA) have joint responsibility for coastal erosion and have established the NI Coastal Forum to develop policy in this area.
- We will continue to engage with the Coastal Forum LDP working group for which includes representatives from DfI and DAERA as well as local Councils and organisations such as the National Trust.
- We will develop appropriate policy to ensure that development is not approved in unsustainable locations prone to coastal erosion and land instability, both now and in the future.
- Policy will be informed by the Northern Ireland Environment Agency (NIEA) Marine Map Viewer.

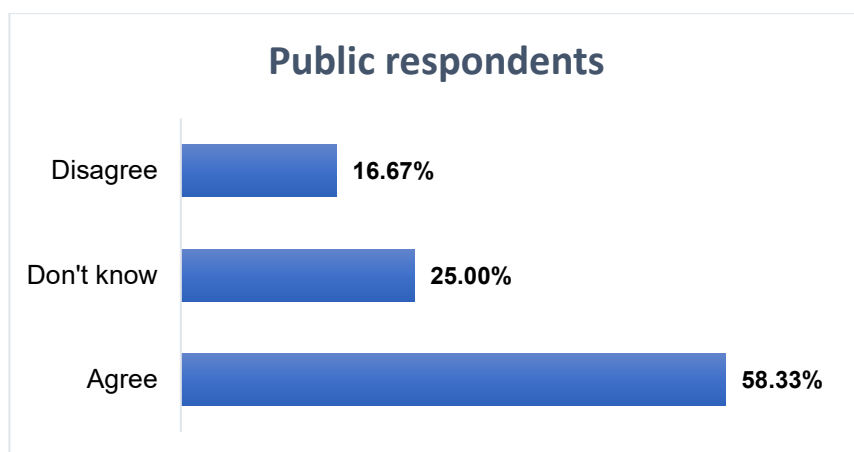
Key Issue 19-20 Flooding and Drainage

Developing within Areas of Flood Risk

Our Preferred Option – Option 19a: Adopt a precautionary approach to development – only permit certain suitable types of development in flood prone areas, in line with the Strategic Planning Policy Statement (SPPS) and retained Planning Policy Statements (PPS) and with appropriate mitigation.

We Asked

Do you agree with the preferred option? 24 respondents



Issues Raised

- There was public support for the precautionary approach to development.
- Respondents advised that natural flood plains and natural watercourses should not be subject to development pressure and should therefore be retained and restored of as a form of flood alleviation and an important environmental and social resource.
- Some felt that the policy wording was not strong enough and that there should be no development permitted in areas of flood risk, except in exceptional circumstances.
- Concern was expressed about the Council's liability in the future, as people who re-build homes on land which is certain to flood again may be very unhappy that they were not encouraged to pursue other options.

Consultation Body Comments

- 2.96. DfI Planning advised that whilst information on Planning Policy Statement 15 (PPS15) – 'Planning and Flood Risk' is useful in relation to the existing context for decision making, the Council will be aware that the context for making decisions on the content of the Local Development Plan (LDP) under preparation is the Strategic Planning Policy Statement (SPPS) for Northern Ireland.
- 2.97. DfI Rivers stated that Local Plan Policies should comply with paragraphs 6.99 to 6.132 of the SPPS in relation to flood risk management. All Local Plan Policies will have to consider flood risk from rivers, the sea, surface water and Controlled Reservoirs as defined by the Reservoirs Act (Northern Ireland) 2015. They

advised that Council should work closely with DfI Rivers when drafting policy in relation to the precautionary approach and the presumption against development within areas at risk of flooding from rivers, the sea, surface water, and controlled reservoirs other than in exceptional circumstances to ensure it is compliant with paras 6.106 to 6.122 of SPPS.

- 2.98. Natural Environment Division (NED) suggested the addition of a third option within the policy for considering proposals for 'developments that can demonstrate a need' for a floodplain location.
- 2.99. Northern Ireland Housing Executive (NIHE) would like to see a comprehensive policy, which deals with mitigating flood risks and flood prevention so that new development does not increase the risk of flooding. They encouraged the use of Sustainable Urban Drainage Systems (SuDs) and advised that it is important that Drainage Assessments be provided for residential developments as required by the current approach set out in PPS15. The Housing Executive supports the precautionary approach to flooding taken in PPS15, and would like to see these included within the LDP.
- 2.100. Forest Service (DAERA) recommends a precautionary approach to development in areas of flood risk. However, it should be considered that the intensity and frequency of flooding can be affected by land use. Forest Service owns and manages several forests in the North Down and Ards Peninsula primary river basin area and would welcome any appropriate proposals to increase the establishment of additional forests including riparian woodland in the area.

Consideration And Way Forward

- We welcome the clear support shown for the precautionary approach to development in proximity to areas at risk of flooding.
- We will continue to engage with statutory consultees and use the most up to date information to inform the Local Development Plan (LDP).
- We will liaise closely with neighbouring councils to share information and best practice.

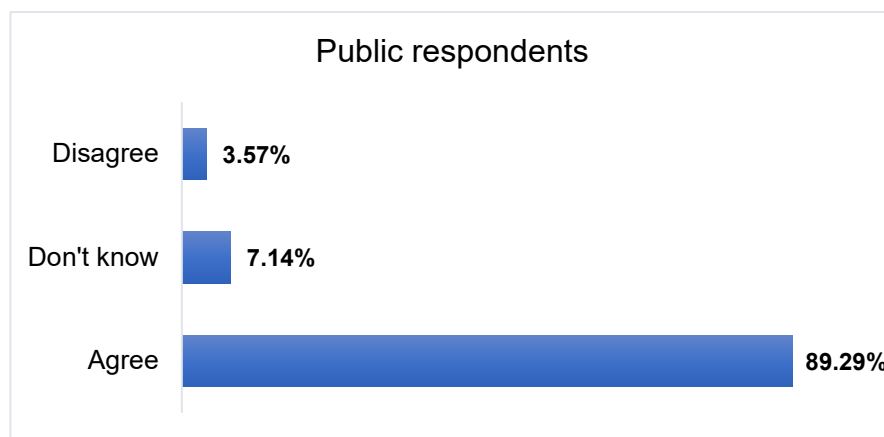
Key Issue 20 – Flooding and Drainage

Sustainable Urban Drainage Schemes (SuDS)

Our Preferred Option – Option 20a: Bring forward policy to require the use of Sustainable Drainage Systems (SuDS) in new developments.

We Asked

Do you agree with the preferred option? 28 respondents



Issues Raised

Strong support was expressed for SuDS.

- Respondents were of the opinion that SuDs should be used everywhere where practical. Ideally all new houses would be required to incorporate a SuD in their design.
- Others stated that SuDS should be required within all new developments, and the ambition of the Preferred Option is strengthened to include retrofits to existing developments when assessments prove the need.
- It was also noted that in addition to protecting against flood risk and pollution, SuDS can also bring social, economic and environmental benefits such as providing valuable habitat for wildlife and creating green spaces within urban areas.
- The view was also expressed that where SuDs are not possible/practical, or the discharge volume is low, this should not prevent development taking place, where the development otherwise complies with policy.

Consultation Body Comments

- 2.101. DfI Planning stated that they were encouraged by the Council effort to make further progress in addressing this key issue. They advised that Council should consider further implementation of this policy option, including the management and maintenance of SuDS solutions in the long term.
- 2.102. DfI Rivers agreed with Key Issue 20 to promote the use of SuDS. DfI Rivers advised that they have no remit to specify the type or design of any SuDS system used by a developer, and that Council should consider long term maintenance and adoption of any such systems, particularly the use of soft SuDS options. DfI Rivers, when considering discharge proposals, require evidence of adequate attenuation volume within the curtilage of a site, an appropriate restriction mechanism and information regarding long term maintenance and adoption.
- 2.103. Northern Ireland Housing Executive (NIHE) advised that flooding could cause a detrimental effect on people's health and wellbeing, on the local environment and the economy. Therefore, they advised that they would like to see a comprehensive policy, which deals with mitigating flood risks and flood prevention so that new development does not increase the risk of flooding. They encourage the use of SuDs and believe that it is important that Drainage Assessments be provided for residential developments as required by the current approach set out in PPS15. The Housing Executive supports the precautionary approach to flooding taken in PPS15 and would like to see these included within the Local Development Plan (LDP).
- 2.104. The Minerals and Petroleum Branch of the Department for the Economy (DfE) advised that SuDs will not work in all cases. Encouraging water to infiltrate or be retained can lead to an increase in groundwater levels which in turn can lead to flooding in other areas. Therefore, a pragmatic approach should be taken to SuDS with the ground conditions carefully considered to ensure that SuDS will function properly and not cause problems with drainage in other locations.
- 2.105. Invest Northern Ireland (INI) agreed that SuDS should be the preferred method of managing surface water drainage within new urban development. It is

acknowledged that this approach will go further than the current policy as it will encourage the integration of SuDS irrespective of whether there has been a history of pluvial flooding or not.

- 2.106. DfI Water and Drainage Division advised that it may be prudent to also include other options for SuDS which are currently adoptable by NI Water including oversized pipes and attenuation tanks. The Department would particularly encourage the use of SuDS systems within the curtilage of new sites, especially housing developments, this could include suggesting permeable paving for private driveways etc. The use of SuDS types that include ponds and wetlands is also welcome. However, the Council must be satisfied that this infrastructure is properly adopted and maintained.

Consideration And Way Forward

- We welcome the considerable level of support for the incorporation of SuDs.
- We will be working with statutory agencies to explore the implementation of this preferred option, whilst aware that this may not be appropriate for all proposals and locations.
- We will develop appropriate Supplementary Planning Guidance (SPG) to accompany the policies in the Draft Plan Strategy (dPS). This should assist applicants in the incorporation of SuDS into their planning proposals.

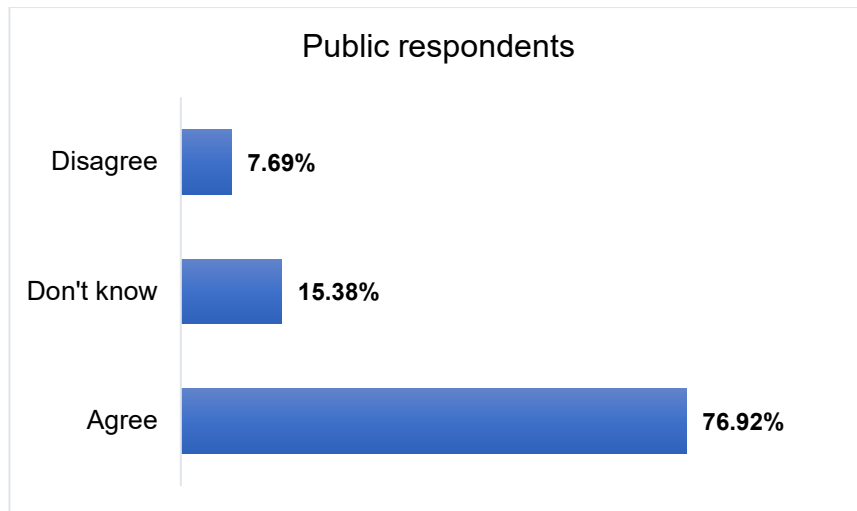
Key Issue 21-22 – Historic Environment

Protecting and enhancing the Built Environment of our Borough

Preferred Option – Option 21a: Maintain the existing approach for protecting and enhancing the historic environment of the Borough, whilst reviewing existing designations and identifying new areas for designation as appropriate.

We Asked

Do you agree with the preferred option? 26 respondents



We Asked

Do you agree with this approach to the preservation of our historic environment? 17 respondents

Issues Raised

- Strong support was expressed for the retention of the plot size policy approach contained within the extant North Down and Ards Area Plan (NDAAP) 1984-1995 as a means to protect the historic environment. It was also expressed that to assist with the protection of amenity and character of this area against unsuitable development proposals it is necessary to set out key characteristics of the area in a similar manner to other local development plans.
- Respondents were supportive of protecting heritage assets in accordance with the Regional Development Strategy (RDS) and prevailing policy to ensure the Borough maintains its distinctive character and rich history, which can be critical for attracting tourism and fostering a sense of place in neighbourhoods.
- Respondents raised concern that there was an imbalance between the tools available to the Council for the previous Ards area compared with that for North Down. It was requested that the policy in the emerging Local Development Plan (LDP) is reviewed to provide for sufficient identification of the key features applicable to Areas of Townscape Character (ATCs).
- It was suggested that the Council should take the approach in line with the Strategic Planning Policy Statement (SPPS). In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will

be required having regard to the scale of any harm or loss and the significance of the heritage asset.

- There was support in specific situations for the withdrawal of permitted development rights to preserve the character and appearance of the area, should be supported.
- There was also support for a realistic approach to historic and listed buildings, which does not just seek to maintain them, but allows sufficient flexibility to bring them back into use and enhance them. This will involve appropriate and sympathetic changes to their fabric.

Consultation Body Comments

- 2.107. DFI Planning noted that the Preferred Option 21a is a requirement of the SPPS in the preparation of a plan under an evidence-based approach, where the Council reviews existing designations and where appropriate identifies new areas for designation.
- 2.108. The Northern Ireland Housing Executive (NIHE) stated their support for the Built and Natural Environment Strategies, which afford protection for natural and built environments. NIHE believe these are important as both built and natural heritage foster a sense of place and belonging to an area. They expressed the belief that there is potential in future Plan Strategy policies to include a new statement on Conservation Areas and Areas of Townscape/Village Character, to limit the weight given to precedent as a material consideration within these areas.
- 2.109. Forest Service (DAERA) welcomes the preferred option, particularly the addition of identifying new areas for designations. Forest Service land contains many historic features including those in the Northern Ireland Sites and Monuments Record.

Consideration And Way Forward

- We welcome the strong support shown for our preferred option. There is clear appreciation for the historic environment expressed by members of the public.

- We will seek to protect and conserve our built heritage assets through the LDP whilst recognising their importance and role in creating the sense of place of the Borough and facilitating the appropriate continued use of historic buildings.
- A policy approach that recognises the value of the asset from the outset and then proceeds to develop a design concept that incorporates it into the scheme is likely to achieve a higher quality outcome.
- We will consider the use of Statements of Significance (which are already widely used in other jurisdictions) to achieve this aim.
- SPG will be produced for Areas of Townscape Character.

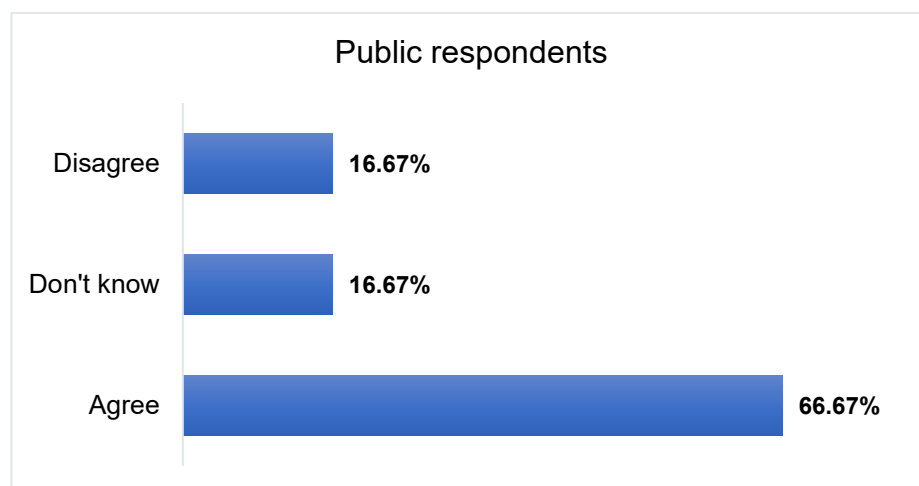
Key Issue 22 – Historic Environment

Safeguarding Non-Designated Heritage Assets

Our Preferred Option – Option 22a: Bring forward specific measures to safeguard against the potential loss of non-designated heritage assets.

We Asked

Do you agree with the preferred option? 24 respondents



We Asked

Are there any local buildings or landscape features that you think should be recognised in a Local Heritage List? 20 respondents

And, if so, what are they and why should they be included? 14 responses

Issues Raised

- Concern was expressed at an additional level of administrative burden for historical assets that are not listed because of the risk of fines or enforcement if they are caught under a new “net.” If an asset is historically worthy, it should be listed and if it just ‘looks nice’ it is not grounds for listing.
- However, most responses were favourable, and many buildings suggested as worthy for consideration. Including some that are already protected by designation: Killinchy Presbyterian Church, Sketrick Castle, Nendrum monastic site, and Balloo House were repeated in particular.
- Other properties listed include: the Water Tower in Donaghadee, The Walled Garden in Castle Park in Bangor, the Royal North of Ireland Yacht Club, the Royal Ulster Yacht Club, Groomsport Harbour, the RAF Airdrome Control Tower and the Firing Range buildings in Kircubbin, the Lime Kilns in Ballywalter, the village centre of Portaferry, and cottages on Manse Road in Cloughey.
- There was a desire that there should be a specific public consultation on this aspect of the Local Development Plan (LDP) to allow residents of the Borough to identify heritage assets that should be safeguarded within the LDP.

Consultation Body Comments

- 2.110. DFI Planning welcomed that the Council has indicated a desire to protect these non-designated heritage assets. The retention of non-designated heritage assets and the formulation and use of local heritage lists will help to maintain the distinct character and history of the area. Council should consider how such an approach might operate in practice.
- 2.111. The Northern Ireland Housing Executive (NIHE) supports the Built and Natural Environment Strategies, which afford protection for natural and built environments. These are important as both built and natural heritage fosters a sense of place and belonging to an area.
- 2.112. We believe that there is potential in any Plan Strategy policies to include a new statement on Conservation Areas and Areas of Townscape/Village Character

(ATCs/AVCs), to limit the weight given to precedent as a material consideration within these areas.

Consideration And Way Forward

- We welcome the strong support shown for our preferred option to safeguard against the potential loss of non-designated heritage assets.
- We also welcome the range of suggested locations, from the public, which could be considered as a non-listed heritage asset.
- We will engage further with Historic Environment Division (HED) and other bodies and consultees to explore how this approach could be managed and delivered in practice.

Key Issue 23-25 – Natural Environment

Protecting International and National Nature Conservation Interests (designated outside of the Local Development Plan (LDP) process).

Our Preferred Option – Option 23: Adopt an approach in line with existing regional policy with regards to protecting and enhancing international and national conservation sites that are not LDP designations.

We Asked

Do you have any comments on this Issue? 26 respondents

Issues Raised

- There was strong support for the retention of the national and international designations, as well as existing Tree Preservation Orders (TPOs).
- The Council Preferred Option was supported both for the environmental benefits and associated social and health benefits which natural heritage assets can provide for residents living in settlements throughout the Borough and wider province.
- There was agreement that the Council should implement adequate policies to protect designated areas from unnecessary or inappropriate development, so

that they can be enjoyed by future generations. It was also stated that the precautionary principle should be applied to the most sensitive areas.

- It was requested that the current policy provisions of Planning Policy Statement 2 (PPS2) – ‘Natural Heritage’ be carried across in full into the LDP to ensure that the LDP policy wording contains sufficient detail to apply the international obligations under the Birds and Habitats Directives, the Ramsar Convention, and protected sites case law.
- Other responses advised that this approach, however lacked ambition in furthering the conservation of biodiversity in places. Notably, the latter is a duty placed on all councils by the WANE Act 2011. It was viewed that the importance of ecosystem services has not been addressed within the Preferred Options Paper (POP), and as such it remains silent on how it will seek to address, protect and enhance ecosystem services. It was also observed that only a very small proportion of our biodiversity is protected in designated sites.

Consultation Body Comments

- 2.113. DFI Planning noted that no alternative options are put forward on this key issue as nature conservation assets require statutory protection.
- 2.114. The Northern Ireland Housing Executive (NIHE) supports the Built and Natural Environment Strategies, which afford protection for natural and built environments. They believe these are important as both built and natural heritage fosters a sense of place and belonging to an area.
- 2.115. NIHE agrees with the preferred options specified in relation to the Natural Environment and would like to see a policy incorporated within the LDP which supports the protection of trees. There is also an opportunity for the LDP to increase tree provision, especially by requiring it within new developments. The Housing Executive believes it is important to protect and create woodland and to increase the number of trees within cities and towns.

Consideration And Way Forward

- We welcome the strong support for the continued approach to protecting international and national nature conservation interests.
- The Borough has a wealth of natural assets recognised and designation at International and National level. We recognise that these are designated outside the planning process.
- We will continue to protect the Borough's assets through the suite of natural environment policies contained within the Local Development Plan (LDP).
- We will continue to engage with statutory consultees.

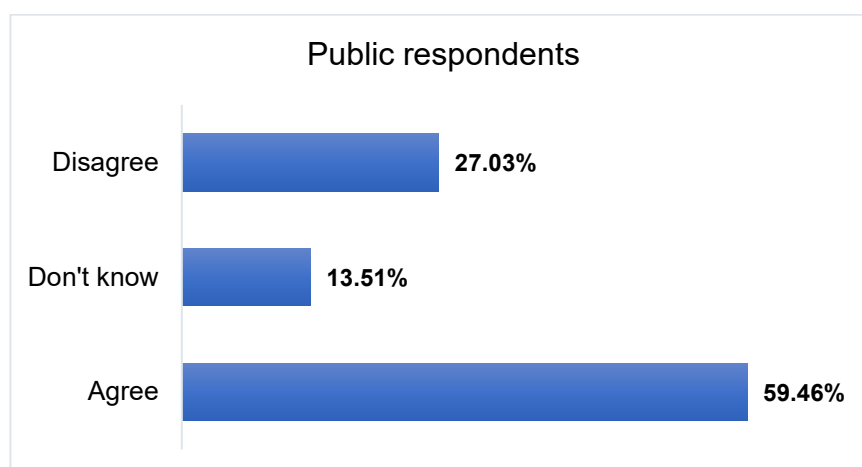
Key Issue 24 – Natural Environment

Protecting and Enhancing Local Nature Conservation Sites and Scenic Landscapes.

Examples of these are, Sites of Local Nature Conservation Importance (SLNCI) Landscape Wedges, and Local Landscape Policy Areas (LLPAs). Our Preferred Option – Option 24a: Review local nature conservation sites and scenic landscapes and formulate appropriate accompanying policy for their protection and enhancement.

We Asked

Do you agree with the preferred option? 37 respondents



Issues Raised

- The response to this question was varied.
- There was considerable support expressed for the retention of Groomsport Landscape Wedge.
- There was support for the Local Development Plan (LDP) to replicate Planning Policy Statement 2 (PPS2) – ‘Natural Heritage’ policies.
- Support was expressed for the identification, retention and enhancement of Local Landscape Policy Areas (LLPAs), which make a positive contribution to the district’s biodiversity.
- Additionally, respondents expressed support for protection via local designations, including Sites of Local Conservation Interest (SLNCIs). It was suggested that Policy NH 5 – ‘Other Habitats, Species or Features of Natural Heritage Importance’, from PPS2 should be adopted in full within the LDP, as it provides an important ‘catch-all’ for habitats, specials or features of natural heritage importance which currently fall out with designated areas.
- Respondents further advised that only a very small proportion of our biodiversity is protected in designated sites, so areas of lowland grassland, for example, are important.

Consultation Body Comments

- 2.116. DFI Planning welcomed the preferred approach 24a and notes that it is a requirement of the Strategic Planning Policy Statement (SPPS) that, ‘Planning Authorities should apply the precautionary principle when considering the impacts of a proposed development on National or International significant landscape or natural heritage resources’.
- 2.117. The Northern Ireland Housing Executive (NIHE) supports the Built and Natural Environment Strategies, which afford protection for natural and built environments. They believe these are important as both built and natural heritage fosters a sense of place and belonging to an area. NIHE agree with the preferred options specified in relation to the Natural Environment.

Consideration And Way Forward

- We welcome the strong support given to the preferred option to review local nature conservation sites and scenic landscapes and formulate appropriate accompanying policy for their protection and enhancement.
- We note the strong support for the retention of existing Rural Landscape Wedges, in particular support for the Groomsport Wedge and will take due regard to it within the review to consider based on available evidence.
- We will review the boundaries of existing Local Landscape Policy Areas (LLPAs) and Landscape Wedges at Local Policies Plan (LPP) stage and ensure that any new or amended LLPAs are informed by further study and through ongoing engagement with relevant statutory consultees. We will also take account of the comments received in response to this consultation.
- Sites of Local Nature Conservation Importance (SLNCIs), we will consider whether this layer of nature conservation protection continues to be necessary within the Borough. The implementation of the Biodiversity Checklist and the passage of time since the site survey work undertaken to inform the SLINCI's will be part of the consideration in whether this designation is brought forward within the dPS.

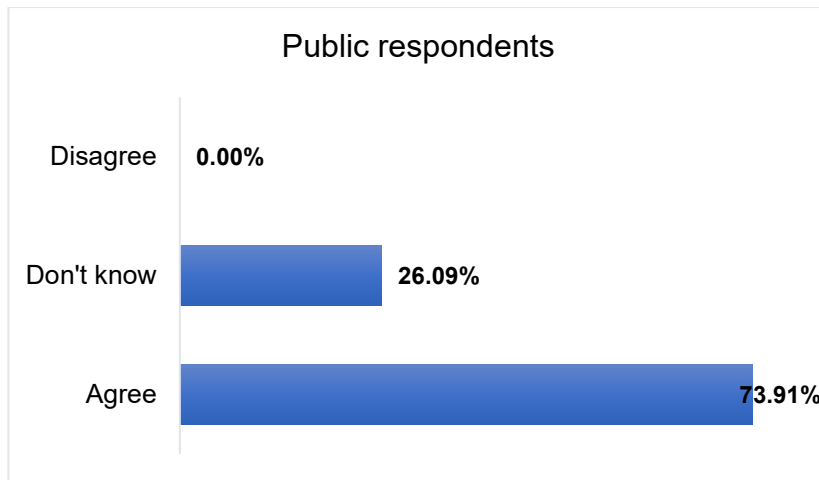
Key Issue 25 – Natural Environment

Areas of Outstanding Natural Beauty (AONBs)

Our Preferred Option – Option 25a: Bring forward bespoke policies to guide future development and protection of Strangford and Lecale AONB.

We Asked

Do agree with the proposed option? 23 respondents



We Asked

Are there certain areas within the AONB that are particularly sensitive to certain types of development? 12 respondents

Issues Raised

- Responses stated that our parklands and seashores should only have the most sensitive development permitted.
- Others stated that more parking should be made available for locals and tourists.
- The Borough is characterised by the beauty of Strangford Lough, the countryside around it and the small rural roads that weave throughout the countryside.
- Respondents would like to identify that Strangford Lough as an important local nature resource for residents from surrounding towns as well as the wider province. To this end they would widely support its protection from inappropriate development including extensive tourism development, not only for the environmental benefits but also to ensure its longevity as a natural environment to be enjoyed by everyone.
- Concern was expressed for minerals development, within the Strangford and Lecale AONB and unauthorized slipways, jetties and fences along the foreshore of Strangford Lough, particularly north-west of the Lough.
- A range of views were received regarding wind energy development within the AONB.
- Some views stated that there needed to be an open mind about the development of technological and environmental infrastructure, in particular renewable energy.

- Also, that we need be flexible, and not allow traditional aesthetic preferences to stifle the development of renewable energy sources, namely wind and solar generation, with a share of income generated going into the host community.
- Others held the view that the whole AONB is sensitive, and development should be resisted.
- Others stated that whilst keen to protect AONBs, they consider that visual amenity alone should not be sufficient reason to reject renewable energy proposals stating that climate breakdown presents a more serious threat to AONBs than wind turbines.

We Asked

How should the LDP respond? 13 respondents

Issues Raised

- A regional approach was suggested to renewable energy locations where there is identification of sensitive landscapes and seascapes exercise, this should include designated and non-designated sites, in order that sensitive sites and species are avoided.
- Some suggested that there should be a blanket refusal to consider any development proposal for minerals development, while others suggested that the Council should emphasise all opportunities and benefits of renewable energy to the community, such as, local industry and local jobs as well as reduced electricity bills as we become self-sufficient.
- The LDP should bring forward bespoke policies to protect the character of the area and ensure that development in the AONB is more sympathetic to, and in keeping with, the area, and should be of an appropriate scale and design.
- Policy should apply a list of criteria on assessing the individual and cumulative visual impacts of development from either side of the Lough.

Consultation Body Comments

- 2.118. DFI Planning welcomed the preferred option 25a to tailor policy to recognise the unique characteristics of the AONB. DfI suggested that it may be helpful to identify parts of the AONB which are known to be sensitive to certain types of

development and bespoke policies could then be developed from this information.

- 2.119. NIHE expressed support for the Built and Natural Environment Strategies, which afford protection for natural and built environments.
- 2.120. Forest Service (DAERA) also agreed with the Council's Preferred Option. They advised that there are several Forest Service forests in the Ards and North Down Council area but only one forest, Mount Steward, in the AONB. As this is a low-lying forest the likelihood of negative visual impacts due to forestry activities will be low. However, more elevated areas within the AONB would be more sensitive to development as their impact may be more visible.

Consideration And Way Forward

- We welcome the positive response to this proposal to tailor planning policy to the Strangford and Lecale Area of Outstanding Natural Beauty (AONB).
- We will commission a Landscape Character Assessment Review to inform the evidence base of the Local Development Plan (LDP).
- We will present bespoke planning policy within the Draft Plan Strategy (dPS) for the AONB taking into account responses received.
- We note that concern has been raised about renewable energy and minerals development within the AONB and will engage further with statutory consultees. We will also engage with our neighbouring councils, Newry, Mourne and Down District Council (NMDDC) due to the geographical extent of the shared AONB.

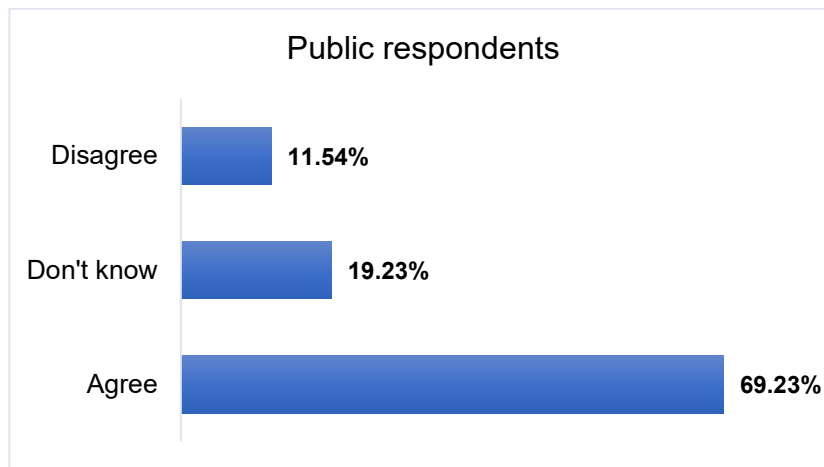
Key Issue 26-30 – Employment and Industry

Provision of a generous supply of Land for Economic Development within Settlements.

Our Preferred Option – Option 26a: Evaluate existing zonings for economic/employment land and identify new sites to meet local employment and economic development needs.

We Asked

Do you agree with the preferred option? 26 respondents



We Asked

Do you agree with the approach to evaluate existing zonings for economic/employment land and identify new sites? 17 respondents

Issues Raised

- There was support for encouraging local economic development which will reduce the distances travelled by employees reducing congestion caused by the amount of traffic leaving the Borough.
- Respondents also stated that it is imperative that there is a strong preference for development to be on brownfield sites in, or adjacent to, existing centres.
- There was support for the re-evaluation of existing employment zoned sites through a full audit as some were viewed to be in the wrong place and/or undeliverable.
- It was suggested that mixed use zonings, as advocated by the Strategic Planning Policy Statement (SPPS) should be considered in some locations.
- It was recognised by members of the public that different types of industry and land uses require different locations and development needs and that there is still a significant amount of land zoned for industrial/employment use that remains undeveloped around the Borough.
- Respondents advised that it may be appropriate to issue “a call for sites” and seek to match business profiles with existing sites. This may result in the growth

of Enterprise Zones to encourage new economic development and regeneration of existing underutilised employment sites.

- It was suggested that new sites should be identified close to existing villages to provide local employment opportunities, but these should be of an appropriate scale both in terms of land area of each site and overall size of development.
- The opposite was also suggested when it was stated that there is sufficient land already zoned for economic/employment needs.
- That the take up in recent years has been low and there will still be land available at the end of the Local Development Plan term and that there is minimal need for substantive new sites in Bangor or Newtownards.
- Members of the public stated that as the existing zonings have been in effect for a long time now and that it seems unfair to move the goalposts at this late stage, unless there are locations where planning permission has not been granted despite concerted efforts to achieve it.

We asked?

Q60 Where should new sites be located? 13 respondents

Issues Raised

- Where demand has been identified with the ability to alter this as demand is met or changes over time.
- If a site has been developed in the past and gone into disuse, let it be developed.
- In addition to size and location considerations of larger economic zonings, cognisance when defining such sites should also be given to potential range of employment uses, ability to develop and support key business sectors, and successfully deliver other initiatives, e.g., regeneration in order to fully integrate sustainable growth within the Council area. Consideration at this stage should also be given to the eventual layout and design.
- As an absolute minimum, all identified sites must be sustainable, consistent with the Sequential Approach/Employment Land Evaluation Framework, fit with all other planning policies, including those set at regional level, and steer development away from sensitive areas (including habitats and species).
- In all new small towns policy should encourage local entrepreneurs.

- Policy should steer economic/employment land to the outskirts of Newtownards and Bangor to allow for easier access to the main transport routes.
- A number of towns such as Comber, Donaghadee, Ballygowan, Holywood have no zoned employment land. Areas for mixed use and/or small business parks should be considered.
- New sites should be encouraged within Ards Peninsula.
- We would be keen to see appropriately sized areas of land set aside for start-up and commercial small businesses in and around Portaferry and other rural towns and villages to sustain and promote the economic activity in these rural areas.
- On the periphery of existing zoning where roads and supporting infrastructure can be further utilised.
- ANDBC could consider permitted development for office buildings in old farm buildings that are no longer suitable for modern agricultural practices.

Consultation Body Comments

- 2.121. DFI Planning welcomed the pragmatic approach to de-zone land if required. The Council considers that the preferred approach will offer a range and choice of sites to promote flexibility and provide for the varying needs of different types of economic activity, however, there is limited detail as to what the required type and scale is likely to be. The Council is reminded of the regional strategic objectives set out in paragraph 6.82 of the Strategic Planning Policy Statement (SPPS) and particularly the requirement to tackle disadvantage and facilitate job creation by ensuring the provision of a generous supply of land suitable for economic development and a choice and range in terms of quality.
- 2.122. Invest Northern Ireland (INI) had no objection to this proposed approach; indeed, such an exercise could prove advantageous in identifying well situated land that could have the potential to meet the needs of modern business. The agency would, however, expect that any re-zoning exercise would not see a reduction in the overall supply of available employment land across the district.
- 2.123. DfI Rivers advised that industrial/economic development should not be considered in areas known to be at risk from flooding. Any new development has

potential to increase flood risk and any potential increase in flood risk should be avoided or mitigated against by suitable Local Plan Policies.

- 2.124. DfI Water and Drainage Division advised that when assessing the quantity of land required for business accommodation, provision should be made for green space for sustainable drainage, where appropriate. Innovative ways of dealing with surface water should be considered. The use of sustainable drainage systems as the preferred means of dealing with surface water should be promoted and that land zoning should take account of wastewater capacity.
- 2.125. The Northern Ireland Housing Executive (NIHE) supported the preferred option. The Housing Executive also supported locations within in the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car. NIHE noted that reducing travel demand through integration of land-use planning, and transport is a key objective of the draft Programme of Government (dPfG) delivery plans.
- 2.126. The Minerals and Petroleum Branch of the Department for the Economy (DfE) advised that the availability of the Sherwood Sandstone Aquifer within the Council area should form a key consideration for the zoning of employment land. Three of the top six performing businesses in the Borough all rely upon water supplies from the Sherwood Sandstone group. Without this provision these companies would struggle to maintain production.
- 2.127. In an effort to attract businesses into the Borough, zoning areas that can access this resource would be a prudent step and could enhance the prospect of attracting inward investment.
- 2.128. Forest Service (DAERA) welcomes the preferred option. This option reflects similar values espoused by the Department of Agriculture, Environment and Rural Affairs (DAERA): the aim of a living working active landscape valued by everyone. In the Council area there are 2,043 ha of non-Forest Service managed forests. The economic contribution to local economies from forest visitors can also be considerable.

Consideration And Way Forward

- We welcome the support for the review of existing land zoned for employment.
- We will commission a review of employment land for the Borough. We will use the evidence base to determine the appropriate land that should be retained or amended and where new sites may be needed. This will be periodically updated to ensure the most up to date evidence is used to inform policy approaches.
- The Council will also carry out an Employment and Industrial Land Monitor to keep a record of the use classes that are existing and proposed within the employment zonings and the amount of land/floorspace that is lost to non- class B uses such as Retail, Leisure and Sui Generis.
- Designations for employment will be reviewed and shown at Local Plan Policies (LPP) stage to ensure that they remain appropriate.
- We will continue to engage with statutory consultees including DFI Planning and Invest Northern Ireland.

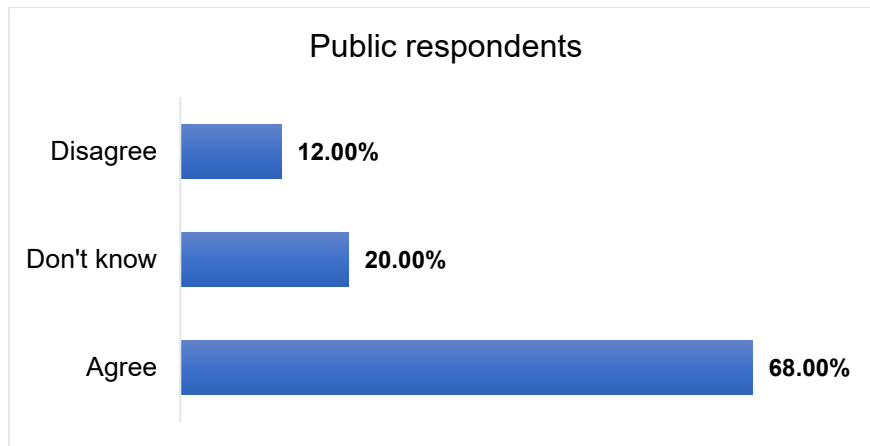
Key Issue 27 – Employment and Industry

Identification of Land to accommodate Business Start-ups and Flexible Co-Working Spaces.

Our Preferred Option – Option 27a: Identify specific sites within economic/employment zonings suitable for business start-ups and flexible co-working spaces.

We Asked

Do you agree with the preferred option? 25 respondents



We Asked

Do you agree that the Local Development Plan (LDP) should identify sites particularly suitable for business start-ups and flexible co-working spaces? 20 respondents

Issues Raised

- There was considerable support expressed for this option
- It was viewed that the preferred option does not provide sufficient flexibility and is too rigid.
- There was also support for a policy approach rather than sites being identified.
- Conversely, others suggested that there was no shortage of commercial properties for sale or rent so there was no need.

We Asked

Where should these be located? 13 respondents

Issues Raised

- There were a range of locations suggested including, co-location with other businesses, within or adjacent to existing zoned sites, in existing business centres, and not out in new zones where networking is limited.
- They should be located within existing zoned sites.
- Co-working and hot desking should be encouraged.
- Currently vacant ground floor retail units and businesses 'over the shop'.

- There was also support for this to be provided in a temporary manner within vacant retail units in order to reduce long term vacancies which have a negative impact on the streetscape.
- It was also suggested that these could and should be located adjoining villages throughout the Borough and in particular along the Ards peninsula.
- A social zone was suggested, rather than an economic area where people could work and reside.
- Commercial buildings in old farm buildings that are no longer suitable for modern agricultural practices, where need is identified.
- It was also suggested that co-working spaces should be in areas in which likely co-workers and those exploring start-up/self-employment options would find it most attractive to congregate. This may especially be the case for artistic/craft ventures where the activity might be seen more as part of life rather than a separate work activity.

Consultation Body Comments

- 2.129. DFI Planning considered that identification of sites, in line with the preferred option 27a will encourage entrepreneurship within the Borough in line with its Integrated Strategy for Tourism, Regeneration and Economic Development. This would also provide access to facilities and resources and encourage collaboration on events and initiatives with other business incubators.
- 2.130. Although the identification of such sites within economic/employment zonings is suggested in the justification of the preferred approach, this is not explored further. The use of redundant buildings/lands on existing development zonings for these purposes is encouraged in line with Regional Strategic Objective 4 as set out in the Strategic Planning Policy Statement (SPPS) (para 6.82).
- 2.131. Invest Northern Ireland (INI) recognises that there can often be significant initial costs associated with starting a new business venture. It is their view that there should be an availability of suitable accommodation that will afford investors/entrepreneurs the opportunity to develop and grow their business. The

agency therefore welcomes the identification of specific sites within economic/employment zonings suitable for business start-ups and flexible co-working spaces.

- 2.132. DfI Water and Drainage Division advised that adequate water, sewerage and drainage infrastructure needs to be in place to facilitate new employment and industry.
- 2.133. The Northern Ireland Housing Executive (NIHE) expressed support for the preferred option stating that the designation of a plentiful supply of employment land can support business development and job growth, leading to sustainable communities. NIHE supports locations within in the urban footprint, near to residential areas or close to centres, which are accessible by means other than the private car. NIHE also noted that reducing travel demand through integration of land-use planning.

Consideration And Way Forward

- We welcome the positive response received for this key issue.
- We will undertake additional engagement across Council and with statutory consultees and consider the most appropriate way of supporting business start-up.
- Employment designations, changes and additions will be brought forward at Local Policies Plan (LPP) stage where necessary and utilising up to date evidence.

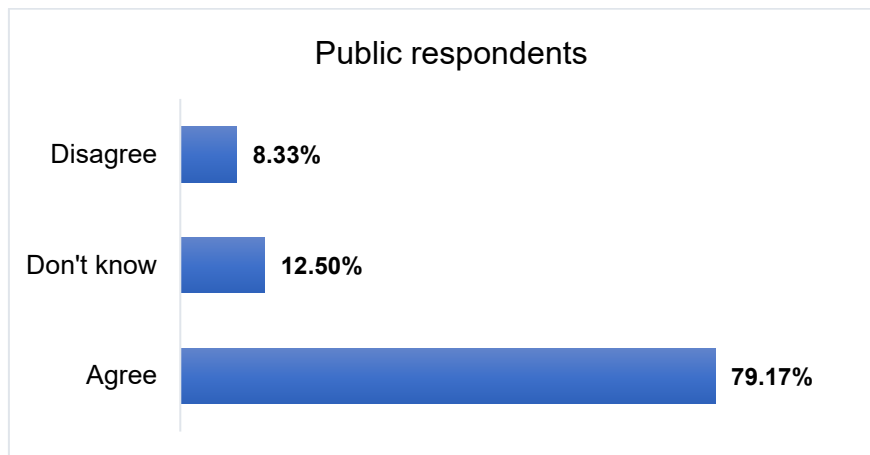
Key Issue 28 – Employment and Industry

Sustaining a Vibrant Rural Economy.

Our Preferred Option – Option 28a: Support and facilitate rural economic development of an appropriate nature and scale which contributes to a sustainable rural economy and supports rural communities.

We Asked

Do you agree with the preferred option? 25 respondents



Issues Raised

- There was support overall for the suggested approach.
- respondents advised that existing employment land must be given protection to avoid it being lost to unfettered and unacceptable uses.
- Opposition was also voiced stating that it was inconsistent with the Strategic Planning Policy Statement (SPPS) as it only facilitates alternative employment uses. There may be cases where other uses (e.g. social housing or community facilities) may outweigh the loss of employment land.
- It was stated that the Preferred Options Paper (POP) makes assumptions that more land means more jobs, when the assumption should be that the right land makes jobs.
- There was support mixed use development, where a case can be made for such, housing can be a driver for employment creation, particularly in our town centres where increased housing provision could help increase footfall in which case the loss of land for employment is compensated by helping to sustain existing businesses.

Consultation Body Comments

- 2.134. DFI Planning advised that the overall approach within the Strategic Planning Policy Statement (SPPS) is to facilitate policies and proposals for economic development in the countryside where these benefits the rural economy and

support rural communities, whilst also protecting and enhancing rural character and the environment. The SPPS identifies a number of opportunities for the rural economy such as, farm diversification, the re-use of rural buildings, and appropriate redevelopment and expansion for industrial and business purposes, as these offer the greater scope for sustainable economic development in the countryside.

- 2.135. The Council, however, considers that the current policy framework ‘largely restricts’ such opportunity. Whilst the preferred option appears to be in line with the SPPS, the justification suggests that the Council’s approach may be more flexible than that under current policy direction.
- 2.136. Invest Northern Ireland (INI) stated that they envisaged that this approach would control rural economic development but will also support development of an appropriate nature and scale to sustain vibrant rural communities. Any development proposals will have to be firm rather than speculative and make use of previously used buildings. INI also recognised the need for, and is supportive of, the principle of making such provision for economic development in the countryside. Many businesses in rural locations have arisen in response to a particular local need, it is important therefore that they be afforded some opportunity to develop and grow in that locale. The cost implications of moving a small rural business to a larger settlement can be prohibitive and limited local growth will allow them to reach a stage of financial capability to make such a move affordable in due course.
- 2.137. The Northern Ireland Housing Executive (NIHE) was generally supportive of the preferred option but stated that they would like to see what ‘an appropriate scale and nature’ entails. They stated support for the policy including a sequential approach of the location of economic development sites with land within settlements being considered first before open countryside sites are investigated to protect rural character.

Consideration And Way Forward

- We welcome the support for sustainable economic development in the countryside.
- We will engage with statutory consultees and present within the Draft Plan Strategy (dPS) policy which aligns with the Strategic Planning Policy Statement (SPPS) outlining opportunities for appropriate economic development to support the rural economy.
- We will recognise complementary employment uses such as tourism and farm diversification.

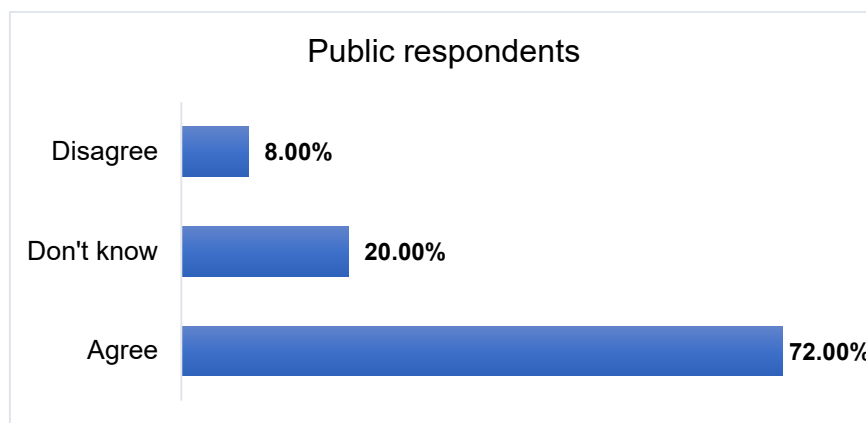
Key Issue 29 – Employment and Industry

Location of Class B1 Business Uses.

Our Preferred Option – Option 29a: Permit B1 business uses in town centres and other suitable locations that may be specified in the LDP such as certain district centres and economic/employment zonings.

We Asked

Do you agree with the preferred option? 25 respondents



We Asked

Do you agree with a more flexible approach to allow B1 Business uses within certain district centres and economic/employment zonings? 13 respondents

Issues Raised

- There was considerable support for this approach.
- Many respondents wished for flexibility within policies to facilitate appropriate scale indigenous 'B1 business use' activity is permitted and encouraged across the entire Borough, including the smaller towns, villages and rural communities.
- It was commented that modern systems of working include new opportunities for homeworking and small scale B1 business use in more rural locations.
- There was also support for encouraging offices to locate in town centres, particularly at first floor, as it would drive footfall, along with enabling street frontage units for retail and leisure uses.
- An alternate view was stated by some who felt that business use should be restricted to town centre locations.
- Newtownards was cited as an example of a small town where development has been allowed in different, separated locations which has led to the division and dilution of all the business areas.

Consultation Body Comments

- 2.138. DFI Planning welcomed the preferred option approach, that it is consistent with paragraph 6.85 of the Strategic Planning Policy Statement (SPPS). They suggested the need for evidence for alternatives outside town centres in relation to B1 Business uses. Council should ensure that the policy for locating B1 business uses is consistent with its policies for economic, town centres, and retail development.
- 2.139. Invest Northern Ireland (INI) were supportive but added that there may, however, be occasions where certain established industries within economic zonings which would not be considered to be B1 or suitable for town/district centre use may wish to develop, for example, a research and development facility to further develop their business. We would assume that in such circumstances, businesses would not be required to demonstrate that there is no appropriate site within the centres to accommodate their scheme.

2.140. The Northern Ireland Housing Executive (NIHE) expressed support for the preferred options as they align with the Regional Development Strategy (RDS) principle to maintain an adequate supply of employment land throughout the Plan period. If employment land is released for alternative uses it would need to be ensured that an adequate supply of employment land is retained to meet the needs of the Borough.

Consideration And Way Forward

- We welcome the public support for permitting B1 business uses in town centres and other suitable locations in specified locations and zonings.
- Survey work including town centre health checks will inform the evidence base for this topic.
- We will continue to engage with consultees.
- Designation of boundaries will be defined at Local Policies Plan (LPP) stage.

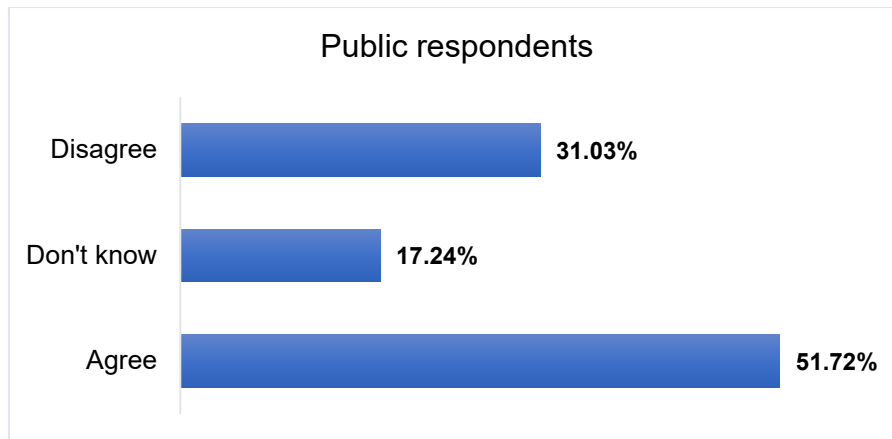
Key Issue 30 – Employment and Industry

Safeguarding Existing Employment Land.

Our Preferred Option – Option 30a: Safeguard against the loss of economic/employment land but permit alternative employment uses which fall outside Part B of the Planning (Use Classes) Order (NI) 2015 within economic/employment zonings where these are compatible with existing uses in the area.

We Asked

Do you agree with the preferred option? 29 respondents



We Asked

Do you agree with the proposed approach to safeguard against the loss of economic/employment land but permit alternative employment uses where these are compatible with existing uses within the area? 12 respondents

Issues Raised

- Supportive comments considered that this option would: improve the options available for use of land; and would safeguard against further loss through unfettered uses permitted on existing zoned economic lands over the last decade.
- There was opposition expressed to including all sui generis uses, with concerns raised that it could be open to severe manipulation.
- Respondents stated that any proposed alternative sui generis use would need to be complementary to the existing land uses, so that there are no compatibility issues or harm to established businesses.
- Alternative uses must not be introduced which would preclude industrial and warehousing type uses.
- Non-Supportive views stated that housing can be a driver for employment creation, particularly in our town centres where increased housing provision could help increase footfall, in which case the loss of land for employment is compensated by helping to sustain existing businesses, and that there may be cases where other uses (e.g. social housing or community facilities) may outweigh the loss of employment land.

- Others believed that the alternative option would see more employment land used, and more jobs created and therein should score higher. Respondents said that Ards and North Down Borough Council makes assumptions that more land means more jobs, when the assumption should be that the right land makes jobs.
- Major Employment locations should be at strategic locations, near transport intersections.
- Plans did not take account of the demise of quality manufacturing in the province for cheaper overseas imports.

Consultation Body Comments

- 2.141. DFI Planning noted the 'alternative uses' referred to by the Council and suggested that there may be compatibility issues with the policy provisions of the Strategic Planning Policy Statement (SPPS).
- 2.142. Invest Northern Ireland (INI) welcomed the onus being placed on the applicant to demonstrate compatibility with other business uses. However, cautioned that this could potentially lessen the attractiveness of such land to other business uses, particularly those requiring a contaminant free environment; within these industries perception of contamination can act as a disincentive when considering investment locations.
- 2.143. In addition, there are non-industrial uses that can attract public footfall, and this has the potential to pose risks to public safety. They also advised against application on a blanket basis on all economic land throughout the district. Instead, the Council could consider specifying certain areas where alternative compatible economic or business uses could be acceptable.
- 2.144. The Northern Ireland Housing Executive (NIHE) expressed support for the preferred options as they align with the Regional Development Strategy (RDS) principle to maintain an adequate supply of employment land throughout the Plan period. If employment land is released for alternative uses it would need to be ensured that an adequate supply of employment land is retained to meet the needs of the Borough.

Consideration and Way Forward

- We welcome the support expressed by the public for safeguarding against the loss of economic/employment land but permitting compatible, alternative employment uses.
- We will undertake surveys of existing zoned employment sites and maintain this evidence base, supplementing this with externally commissioned reports, as necessary.
- We will engage across Council and with statutory consultees.
- We will make any required changes to designated employment sites at Local Policies Plan (LPP) stage.

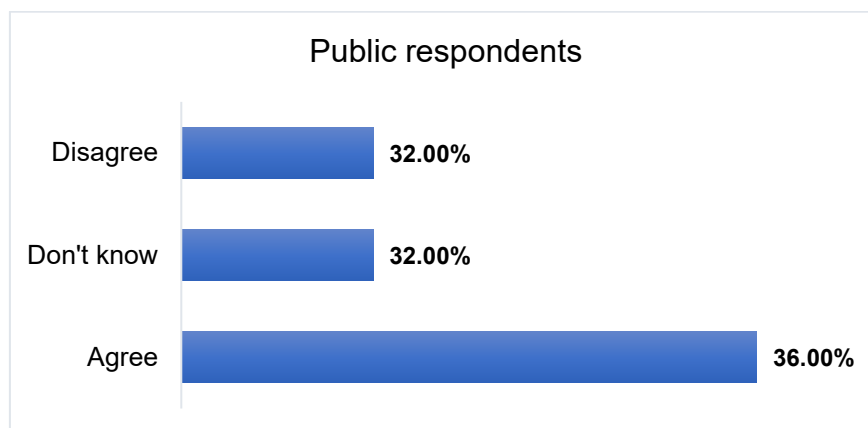
Key Issue 31 – Minerals

Safeguarding Minerals

Our Preferred Option – Option 31c: Adopt a policy led approach to deal with applications for Minerals Development based on their merits, with the identification of protection areas for existing quarries to allow appropriate expansion.

We Asked

Do you agree with the preferred option? 25 respondents



Issues Raised

- Respondents wished to see more detail of the policy approach and stated that any policy must be based on a review of old minerals permissions with support for it to not be delayed any further.
- There was support for Areas of Constraint on Mineral Development (ACMDs) to be identified within the Plan and that the area identified potential should be defined giving consideration to including those species and habitats most at risk in terms of environmental impact, and not just include Areas of High Scenic Value (AHSV) the Local Development Plan (LDP) should identify areas most sensitive to mineral development.
- There was a desire for greater clarity to ensure that the proposed 'buffer areas' are not interpreted as being areas of deemed consent for mineral extraction, with safeguard areas based on evidence.
- Opposition was expressed to the nature of mineral extraction. Respondents stated that in an environmental emergency, industrial activity, which includes mineral mining and quarrying is inherently risky. This is the kind of activity that should be winding down, not expanding in the future.
- Views expressed stated that this subject policy needs to be set in the context which ensures that levels of extraction do not exceed environmental limits, and do not serve to undermine the environmental integrity of wider ecosystems, while also promoting the use of recycled construction materials.
- Respondents stated that sustainable growth of settlements should not be constrained by Mineral Safeguarding Areas (MSAs) and sterilizing land for mineral extraction is entirely contradictory to the aims of protecting quality of rural environment and diversification of rural areas.
- The lack of evidence was expressed both in favour of and against ACMDs and MSAs.
- There was concern about expansion of existing quarries, respondents stated that such developments can be dealt with on a case-by-case basis with the plan providing criteria-based policy.
- Concern was expressed about unconventional hydrocarbon extraction and an absence of mention of fracking in the Preferred Options Paper (POP).

- It was suggested the Council could be asked to include a commitment to prohibit fracking in the Borough and undertakes to grant no exploratory licenses.
- The importance of restoration was reflected in the public respondents with responses advising that mineral sites have the potential to enhance biodiversity and to provide a public benefit at the end of their working lives through restoration and that the framework for restoration should facilitate regular inspection to ensure such plans are followed through to delivery.
- Planning permission should not be granted for peat extraction from new or extended sites or renew extant permissions.

Consultation Body Comments

- 2.145. DfI Planning stated that there is no detail provided on supply and demand of aggregate minerals for the area, however it is recognised that there is work ongoing to collate this information. The Draft Belfast Metropolitan Area Plan (dBMAP) 2015 included Areas of Constraint on Mineral Development (ACMDs), however the Planning Appeals Commission (PAC) report recommended these should not be carried forward, the Department of the Environment agreed and did not progress this designation within the now quashed adopted BMAP.
- 2.146. Ards and Down Area Plan (ADAP) 2015 contains ACMDs. DfI Planning stated that it is unclear if extant designations will be carried forward and encouraged the Council to ensure that, when drafting policies for inclusion in the Draft Plan Strategy (dPS), it seeks to address the range of minerals related issues contained in the Strategic Planning Policy Statement (SPPS), such as, valuable minerals, safety and amenity, visual implications and restoration of minerals workings and peat extraction, unconventional hydrocarbon extraction, and restoration.
- 2.147. DfI Rivers advised that mineral extraction within areas prone to flooding should only be permitted as an exception after flood risks from all sources have been identified and adequate measures to manage and mitigate against increase in flood risk are in place.

- 2.148. Natural Environment Division (NED) advised that the proposed option differs from Regional Policy SPPS 6.155 as the preferred option 31c, proposes not to "identify areas which should be protected from minerals development" and does propose to identify 'protection areas for existing quarries'.
- 2.149. The Minerals and Petroleum Branch of the Department for the Economy (DfE) advised that whilst the value of mineral resource within the Council area is recognised in the Preferred Options Paper (POP), the paper does not consider the significance that sandstone is currently the only extracted resource in the area. Construction of the proposed and associated infrastructure will require additional resources (sand for concrete, aggregate for road surfacing etc.). The Council area does not currently have a local source for these products and must rely on importing them from neighbouring council areas or wider regional sources.
- 2.150. It should be noted by the Council that the positions being adopted by other district council plans might impact on Ards and North Down's ability to source supplies of aggregates. Under the SPPS, councils are required to ensure that sufficient local supplies of construction aggregates can be made available for use within the local, and where appropriate, the regional market area and beyond, to meet likely future needs over the plan period.
- 2.151. Sand and gravel are mapped in coastal parts of the council area, with much contained within the boundary of the Area of Outstanding Natural Beauty (AONB). This local resource may be sufficient to meet the local plan requirements if it was to be developed. The preferred option means that this may be achievable but the requirement for the resource will have to be balanced against the location and other impacts.
- 2.152. In addition, as some deposits are located around the coast of the Ards Peninsula, consideration should also be given to any potential coastal erosion impact that may result from extraction. Minerals development should be considered under the same criteria as general development and extraction should not normally be permitted in areas that are identified as currently or potentially at risk of erosion.

- 2.153. What is not clear from the POP is how the current ACMDs are to be managed going forward and whether the preferred option for management of mineral resources will permit development of these deposits.

Consideration And Way Forward

- We welcome all views on this key issue.
- We note the support for Areas of Constraint on Minerals Development (ACMDs) from a wide range of respondents.
- We will continue to engage with the Mineral Forum Working Group.
- We will encourage the local mineral industry to provide mineral extraction and sales information to both central government and the Council, and also mineral reserves and supply information to the Local Development Plan (LDP) team.
- We will inform potential Mineral Safeguarding Areas (MSAs) at Local Policies Plan (LPP) stage, engaging with the Geological Survey of Northern Ireland (GSNI) on the appropriate methodology.
- We will ascertain the potential for hydrocarbon extraction in the Borough. The Review of Old Mineral Permissions (ROMPS) is out with the control of the Council as its commencement is a matter outside the LDP process.

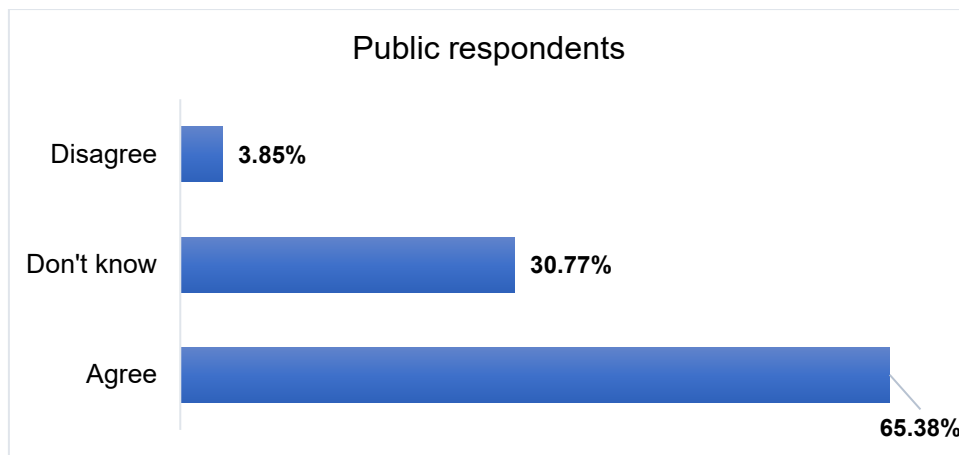
Key Issue 32-36 – Town Centres and Retailing

Hierarchy of Centres

Our Preferred Option – Option 32a: Define a hierarchy of centres based on the preferred settlement hierarchy and the relevant roles and functions of our centres.

We Asked

Do you agree with the preferred option? 26 respondents



We Asked

Do you agree with the proposed approach to define a hierarchy of centres?

14 respondents

Issues Raised

- Convenience retailing by its very nature already takes place outside of town centres in district centres, local centres, arterial routes and in villages throughout the Borough Council area. Investment in such convenience retailing, should not be precluded by the Local Development Plan (LDP).
- Shops which provide modern, local, convenience retailing should be facilitated by the LDP.
- There should be flexibility which would support retail – including footfall.
- It was also suggested by planning agents acting for the owners of Bloomfield District Centre that it should be included in the list of locations to be considered as part of the sequential approach to town centre uses as a town centre.
- There was concern expressed that the hierarchy does not provide sufficient consideration of the value village centres play in supporting the rural economy, particularly in the rural Peninsula areas.
- That the LDP should support change of use and restrict outward extension of town centres.
- There was opposition expressed to designating a new District Centre at Ards Shopping Centre, as it could discourage customers from visiting the currently thriving Ards town centre.

- There was general support expressed for supermarkets, it was suggested that the Local Development Plan (LDP) policy provides for and does not prejudice supermarket development.

We Asked

Are there any retail areas serving local need which should be designated as local centres? 6 respondents

Issues Raised

- Representation by Bloomfield Shopping Centre's agent stated that consideration should be given to including the retail park, which adjoins the covered shopping mall, to be brought within the District Centre boundary.

We asked?

Are there any retail areas serving local need which should be designated as local centres? 6 respondents

Issues Raised

- Consideration should be given to including the retail park, which adjoins the covered shopping mall, Bloomfield, to be brought within the District Centre boundary. The retail park is clearly an integral part of the overall retail offer and site at Bloomfield, with shared access and car parking arrangements.

Consultation Body Comments

- 2.154. DFI Planning advised that the Council should use the Hierarchy of Settlement and Related Infrastructure Wheel (Diagram No. 2.2) within the Regional Development Strategy (RDS) to help identify the level of appropriate services and facilities. The Department welcomes the Council's acknowledgement that District and Local Centres should be a focus for local everyday shopping, and that their role is complimentary to the role and function of town centres in line with paragraph 6.276 of the Strategic Planning Policy Statement (SPPS).

- 2.155. NIHE supports the ‘town centre first’ approach set out in the Preferred Options Paper (POP) for retail to ensure that town centres are vibrant, mixed-use areas which reflects the SPPS. Support was also expressed for meanwhile uses available to business start-ups and social enterprises.
- 2.156. NIHE supported increasing the supply of affordable homes through town centre living initiatives, and by promoting ‘Living Over the Shops’ (LOTS) which can stimulate additional activity and footfall, thereby assisting regeneration.
- 2.157. NIHE would also like to see overarching policy options for town centres beyond retail uses, which includes housing uses. The Local Development Plan (LPD) should consider the long-term future of town centres in the context of changed shopping patterns, the increase in vacant units and consequent need to diversify uses within town centres and flexibility when zoning land in town centres, to support activities beyond retail, including leisure uses.

Consideration And Way Forward

- We welcome the support received for the definition of a hierarchy of centres.
- We will commission town centre/retail studies as necessary.
- We will undertake additional surveys, and the hierarchy of centres determined will be based upon up-to-date relevant information.
- We will use Settlement Appraisals and the consideration of the Settlement Hierarchy evidence consideration using the evaluation framework in the Regional Development Strategy (RDS) and the Strategic Planning Policy Statement (SPPS) to determine the appropriate position for settlements and the range of centres and will continue to engage with statutory consultees.

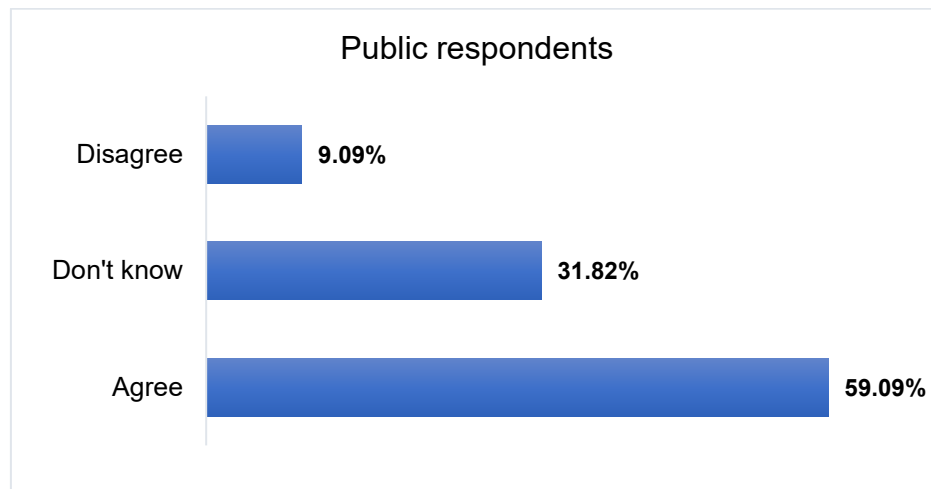
Key Issue 33 – Town Centres and Retailing

Spatial extent of Town Centres and Retail Cores.

Our Preferred Option – Option 33a: Define the spatial extent of Town Centre boundaries and Primary Retail Cores to accommodate the projected need for retail and other main town centre uses.

We Asked

Do you agree with the preferred option? 22 respondents



We Asked

Do you agree with the proposed approach to define the spatial extent of Town Centre boundaries and Primary Retail Cores? 12 respondents

Issues Raised

- Supportive comments were received for this approach.
- There was support for town centre housing as an essential component of town centre regeneration, community cohesion and efficient use of public resources.
- There was a desire for provision of extra free car parking in town centres for the town centre uses.
- There was support for Ards Shopping centre being more than a district centre stating that it was in fact a town centre location.

We Asked

Should the Local Development Plan (LDP) reduce or increase the extent of any town centre or primary retail core boundaries? 12 respondents

Issues Raised

- There was conflict in the views expressed as to whether the boundaries should be greater or smaller.

- Some respondents saying that there should increase town centre boundaries, that each town has its own specific needs and there should be flexibility.
- Whilst others stating that with the changing nature of retailing means town centres should be compressed into a more concentrated offering.

Consultation Body Comments

- 2.158. DFI Planning noted that the Council will undertake an assessment of the need or capacity for retail and another main town centre uses across the Plan area. The findings of this study will enable the Council to adopt a robust approach in relation to designating town centre boundaries and primary retail cores to accommodate the projected need for retail and other main town centre uses over the Plan period.
- 2.159. NIHE supports the 'town centre first' approach set out in the Preferred Options Paper (POP) for retail to ensure that town centres are vibrant, mixed-use areas which reflects the Strategic Planning Policy Statement (SPPS). NIHE support meanwhile use to support the vitality of an area, and we would like to see these spaces made available to business start-ups and social enterprises.

Consideration And Way Forward

- We welcome the varied responses for this key issue.
- We will undertake further survey work and maintain up-to-date information to inform the boundaries at Local Policies Plan (LPP) stage. We will also continue to engage with statutory consultees.

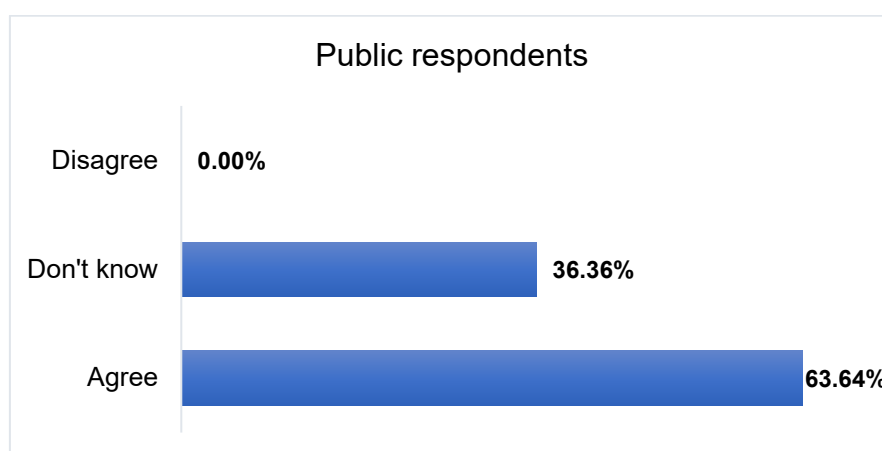
Key Issue 34 – Town Centres and Retailing

Protecting and enhancing diversity of use – Designated Primary Retail Cores.

Our Preferred Option – Option 34c: Designated Primary Retail Cores to be accompanied by policy to allow differing provision of retail and town centre uses based upon locally distinct character.

We Asked

Do you agree with the preferred option? 22 respondents



We Asked

Do you agree with the proposed town specific approach to policy within Primary Retail Cores (PRCs) to reflect the locally distinct character of each town within the Borough? 13 respondents

Issues Raised

- There was support expressed for adopting a flexible approach to facilitate non class 1 uses (e.g., cafes, restaurants, financial, etc.) where appropriate.
- Others stated that vacancy rates show a tailored approach is needed and which is for, 'Designated Primary Retail Cores to be accompanied by policy to allow differing provision of retail and town centre uses based upon locally distinct character'.
- Linked trips have always been a significant and important consideration in driving footfall and other main town centres uses such as cafe, restaurants and pubs can support vibrancy but should not dilute the retail offer in the defined area.
- There was a desire to see more twilight and night-time economies, in conjunction with the daytime uses, to maintain vibrancy and reduce vacancy with commercial leisure development, arts and restaurants in city and town centres to encourage people to stay after the traditional 5pm close which would also provide greater services for tourism.
- The market would dictate what type and how many shops will still survive.

Consultation Body Comments

- 2.160. DFI Planning wished to see further detail as to how this approach would work in practice. For example, taking the ratio of retail units within the primary retail core and advised that management of such an approach would be required in order to ensure that it does not have unintended consequence and give rise to vacancy or dereliction.
- 2.161. NIHE supports the ‘town centre first’ approach set out in the Preferred Options Paper (POP) for retail to ensure that town centres are vibrant, mixed-use areas which reflects the Strategic Planning Policy Statement (SPPS) and would like to see some flexibility when zoning land in town centres, to support activities beyond retail, including leisure uses. NIHE believe there is an opportunity for the Council, development planners and the Community Plan (The Big Plan) to consider town centre strategies including innovative initiatives.

Consideration And Way Forward

- We welcome the mix of views contained within responses for this key issue.
- We note that whilst there is overall support there are also a number of respondents uncertain as to the potential impacts of changes to the town centre boundaries.
- We will undertake additional surveys of the town centres within the Borough to ensure that the evidence is up to date to support consideration of boundaries at Local Policies Plan (LPP) stage.

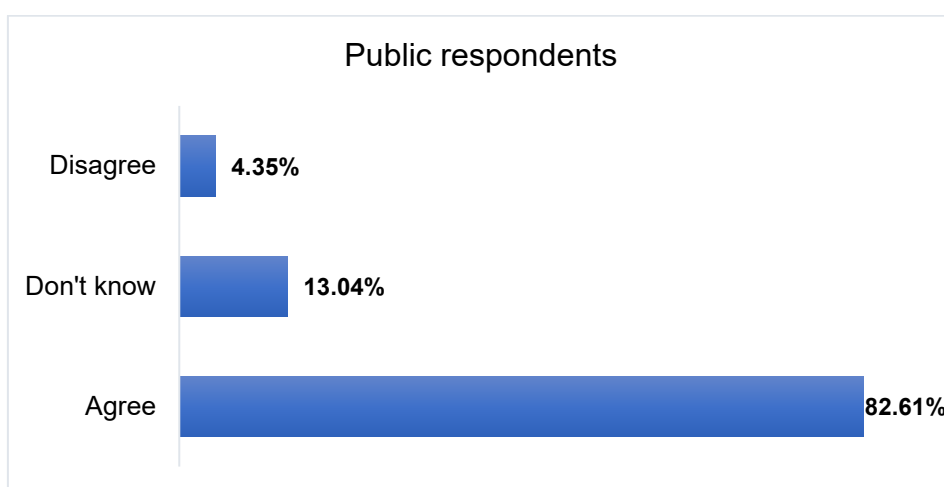
Key Issue 35 – Town Centres and Retailing

Protecting and enhancing diversity of use – Protection of Existing Areas of Housing within Town Centres.

Our Preferred Option – Option 35a: Identify areas of existing housing to be protected and promote new housing development, if appropriate to the character of the area, within town centres.

We Asked

Do you agree with the preferred option? 23 respondents



We Asked

Do you agree with the proposed approach to protect existing areas of housing within town centres? 14 respondents

Issues Raised

- There was strong support expressed for protection of existing housing.
- Housing is better than empty shops and because it may help how people access services.
- Housing improves liveability of town centres.
- There needs to be a comprehensive overall scheme for each town which includes bringing more housing back to the town centres.

Consultation Body Comments

- 2.162. DFI Planning wished to see more evidence in order to assist in the appraisal of options and provide rationale for the preferred approach.
- 2.163. NIHE expressed support for increasing the supply of affordable homes through town centre living initiatives, including KSRs for affordable housing within development opportunity sites and vacant sites, and by promoting 'Living Over the Shops' (LOTS). Town centre living and LOTS can stimulate additional activity

and footfall, thereby assisting regeneration. Therefore, we would like to see the Local Development Plan (LDP) promote town centre living, where due regard has been given to living standards.

- 2.164. NIHE advised that they like to see overarching policy options for town centres beyond retail uses, which includes housing uses.

Consideration And Way Forward

- We welcome the support for housing within town centres.
- We note that there is appreciation by the general public that residents within our town centres assist with town vitality and supports other town centre uses.
- We will gather further information to support the evidence base and site evaluation to underpin any housing designations which will be brought forward at Local Policies Plan (LPP) stage.

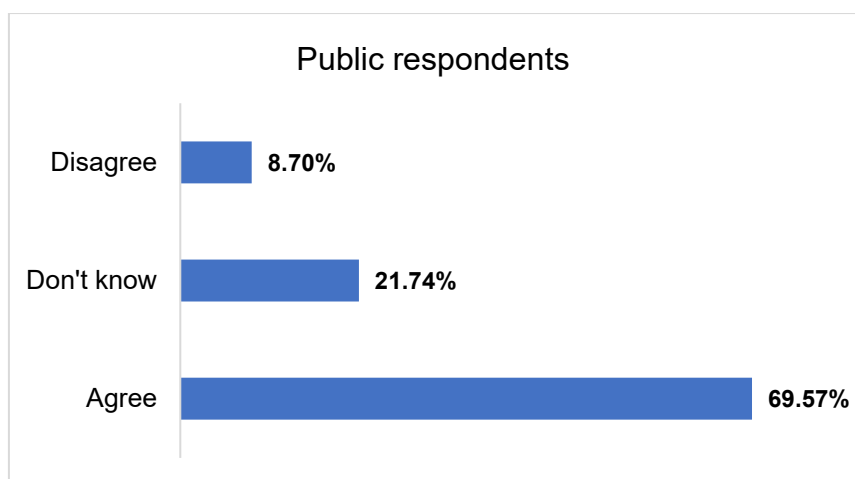
Key Issue 36 – Town Centres and Retailing

Protecting and enhancing diversity of use – Development Opportunity Sites (DOSs).

Our Preferred Option – Option 36a: Define Development Opportunity Sites for mixed use and encourage ‘meanwhile’ uses until development is commenced.

We Asked

Do you agree with the preferred option? 23 respondents



We Asked

Do you agree with our proposed approach to Development Opportunity Sites (DOSs)? (13 respondents)

Issues Raised

- There was support expressed for Development Opportunity Sites (DOSs).
- It was viewed that flexibility would enable “pop-up” shops in vacant units, events or annual festivals will sustain a centres vibrancy. Improvements to the public realm, permeability and connectivity will enable linked trips and enhance the quality of the environment, which will attract and retain people. They would take away unused buildings would encourage non-traditional use and could open up to great community benefit.
- There was also concern expressed on potential negative impacts on other shops and uses, and how this would work in practice, also whether the rate payers would end up footing the bills to prepare the ‘Detailed development briefs and master planning to guide their regeneration’.
- The regeneration and reuse of existing buildings and previously development land, enables a review of the amount, size and location of future units. This can influence the future supply, so that a mix of floorspace can be provided in locations that would align with commercial profiles and requirements.

Consultation Body Comments

- 2.165. DFI Planning stated that there may be a role for 'meanwhile uses' in this regard, the Council is reminded that, as part of the process of identifying sites to be allocated for town centre uses in the plan, it should undertake a 'call for sites' consultation exercise in line with paragraph 6.286 of the Strategic Planning Policy Statement (SPPS).
- 2.166. The Northern Ireland Housing Executive (NIHE) supported meanwhile use to support the vitality of an area, and we would like to see these spaces made available to business start-ups and social enterprises.

Consideration And Way Forward

- We welcome the support for development opportunity sites and meanwhile uses and the contribution that these could make to regenerating spaces that are underused.
- We will continue to engage with statutory consultees. Development Opportunity sites will be designated at Local Policies Plan (LPP) stage following extensive evidence gathering and site evaluation.

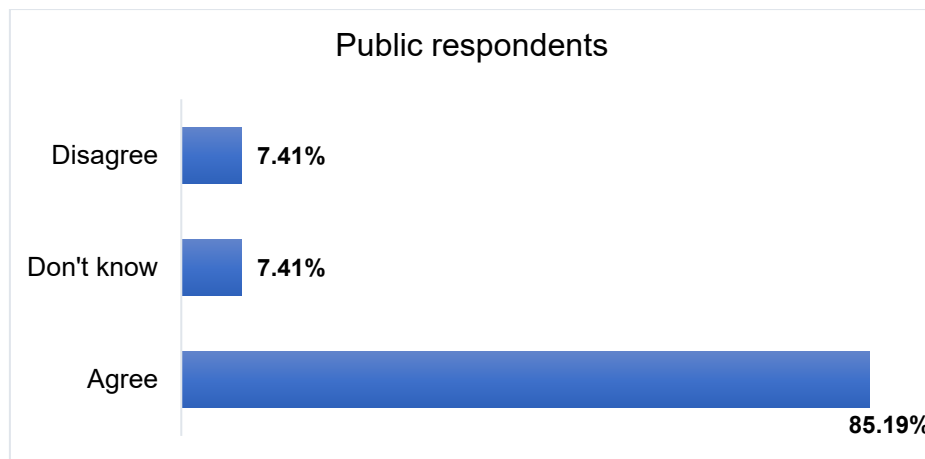
Key Issue 37 – Tourism

Tourism

Our Preferred Option – Option 37b: Support appropriate sustainable tourism developments throughout the Borough.

We Asked

Do you agree with the proposed option? 27 respondents



Issues Raised

- Whilst there was support for sustainable tourism development, there were queries on how the implementation of the hierarchy outlined in the Preferred Options Paper (POP).
- It is recognised that the setting of heritage assets such as Historic Parks, Gardens and Demesnes should be protected, and proposals should be allowed where they would secure the long-term future of a significant place (e.g. historic buildings or a historic park, garden or demesne) and will not materially harm its heritage value or setting (this should not exclude tourism uses).
- It was suggested that the Plan cannot be too prescriptive for future tourist developments.
- There was support expressed that the preferred option allows sustainable tourist growth around the unique and varied natural landscape and coast, which tourists wish to visit.
- There was a desire to see ecotourism, and the promotion of events to attract visitors.
- Others stated that they understood the economic drivers and benefits of tourism. However, parts of our area are particularly sensitive and therefore it was left that they should not be compromised by tourist developments.

Consultation Body Comments

- 2.167. DFI Planning stated that the Council's acknowledgement that the majority of the tourism potential in the Borough exists along the coastline and in rural areas therefore appears to conflict with the proposed tourism

classification. Regional policy directs the safeguarding of tourism assets from unnecessary, inappropriate or excessive development, and identifies how this is a vital element in maintaining a healthy tourism industry.

- 2.168. Tourist amenities should also be steered towards locations benefitting from good accessibility to public transport provision, and wherever feasible, by walking and cycling in line with paragraph 6.301 of the Strategic Planning Policy Statement (SPPS). DfI queried whether the preferred option is compatible with other policy areas, in particular, the approach to Coastal Management.
- 2.169. DfI Rivers advised that tourist facilities (other than water-compatible development) should not be located within areas at risk from flooding.
- 2.170. The Department for the Economy (DfE) advised that they are content that the approach outlined seeks to achieve sustainable tourism growth coupled with the preservation of our built and natural assets. The approach is sensitive to the preservation of the natural environment while seeking to enable communities to prosper sustainably.
- 2.171. Natural Environment Division (NED) advised that clarification was required for Vulnerable Areas and the term 'Countryside' querying the policy test used to determine approval or refusal for a development proposal in such an area.

Consideration And Way Forward

- We welcome the strong support shown for the approach to sustainable tourism across the Borough.
- We will consider the placement of the historic environment within the hierarchy.
- We note the response from consultees regarding potential perceived conflict between tourism and coastal management and natural environment.
- We will engage further with statutory consultees and across Council to clarify the tourism areas that the Tourism Strategy within the Draft Plan Strategy (dPS) identifies as having potential for sustainable tourist development.

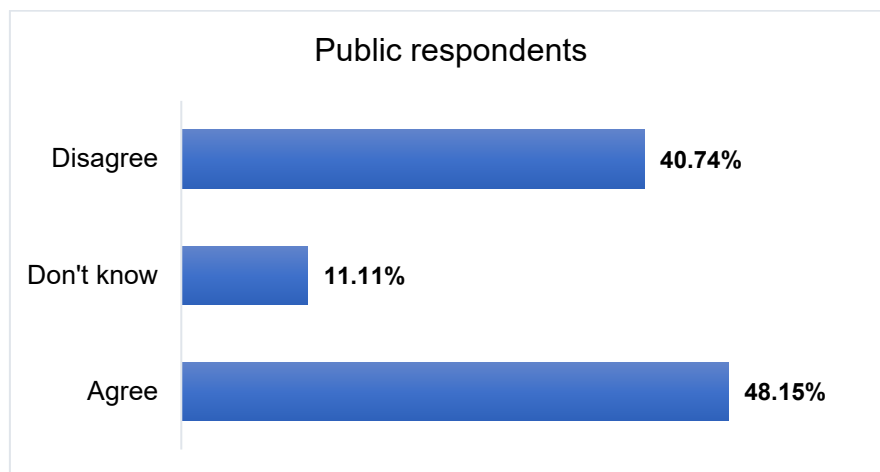
Key Issue 38-42 – Transportation

Promotion of Sustainable Transport and Active Travel.

Our Preferred Option – Option 38a: Introduce a policy requiring applicants to demonstrate how the promotion of sustainable transport and active travel has been considered in all new development proposals. Where appropriate, specific measures will be detailed for zoned sites in key site requirements.

We Asked

Do you agree with the preferred proposal? 27 respondents



We Asked

Do you agree with the proposed approach to place the onus on applicants to demonstrate that sustainable transport and active travel has been considered in all new development proposals? 17 respondents (16.35%)

Issues Raised

- There was cautious support expressed, however the implementation, within rural areas was questioned due to poor transport infrastructure.
- The existing built environment not being consistently well served with sustainable transport options.
- There was the view that the Peninsula and rural areas of the Borough could be disadvantaged.

- There was support the preferred option where it would cluster businesses and services at strategic locations on the transport network which is critical in encouraging linked trips, car sharing and park and ride facilities, which will reduce car usage and journey times throughout the Borough.
- Others believed that the approach was not ambitious enough and they would like to see policy in place to ensure that applicants have to do more than 'consider' sustainable transport and active travel in their proposals, these should be required elements in any new development permitted from here on.
- There was support for developer contributions being used to fund sustainable travel options and developments being designed for active travel, not it being a consideration, EV car charge points in new developments, improvement of walkways.
- There was also support for Travel Plans which incentivise active travel, subsidised travel cards etc.
- The opposite view was also expressed stating that this requirement is unnecessary and would be overly onerous on smaller developers and that it should not be the responsibility of the developer.

Consultation Body Comments

- 2.172. DFI Planning welcomed that sustainable transport and active travel is at the heart of the Council's approach to transportation. The Department considered that this approach is broadly in line with paragraph 6.297 of the Strategic Planning Policy Statement (SPPS), which seeks to promote sustainable patterns of development that reduce the need for motorised transport, encourages active travel, and facilitates travel by public transport in preference to the private car.
- 2.173. NIHE advised that would like the policy wording under transportation to contain a stronger emphasis on sustainable transport to encourage choices including walking, cycling and public transport to promote healthy lifestyles, minimise climate change and to improve connectivity for those who do not have access to a private car, including children and older people. They also wished to see designs, which minimise traffic speeds in new developments.

Consideration And Way Forward

- We welcome the range of responses received for this key issue; they reflect the disparity of views regarding the requirement for demonstrating active travel within proposals.
- We note the support and also the comments regarding potential impact on developers. Further engagement will take place with statutory consultees.

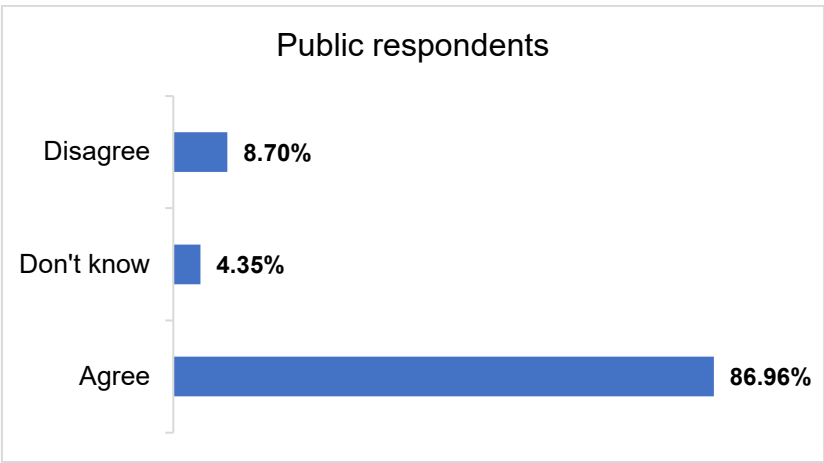
Key Issue 39 – Transportation

Promotion of Sustainable Transport

Our Preferred Option – Option 39a: Identify sites suitable for Park and Ride/Park and Share facilities.

We Asked

Do you agree with the preferred option? 23 respondents



We Asked

Do you agree with the proposed approach to identify sites suitable for Park and Ride / Park and Share facilities? 15 respondents

Issues Raised

- There was support expressed for Park and Ride/Share facilities.
- Respondents wished to see more sites, suggestions included using private car parks such as churches.

- Possible site involves infilling land at Holywood lough shore.
- Responses stated that there should be Park and Ride facilities in Newtownards.
- A need for more in rural areas was suggested.

Consultation Body Comments

- 2.174. DfI Planning advised that the approach will also allow for reviews to be carried out in relation to existing and proposed sites within the extant local development plans and determine if they are still suitable for protection as Park and Ride sites.
- 2.175. NIHE advised that they would like the policy wording under transportation to contain a stronger emphasis on sustainable transport to encourage choices including walking, cycling and public transport to promote healthy lifestyles, minimize climate change and to improve connectivity for those who do not have access to a private car, including children and older people.

Consideration And Way Forward

- We welcome the support demonstrated for Park and Ride/Park and Share sites and note a number of suggested locations.
- Engagement with Department for Infrastructure (DfI) Transport and other consultees will continue and will inform the Local Development Plan (LDP).
- Park and Ride/Share locations will be depicted at Local Policies Plan (LPP) Stage, guided by the most up to date advice from DfI.

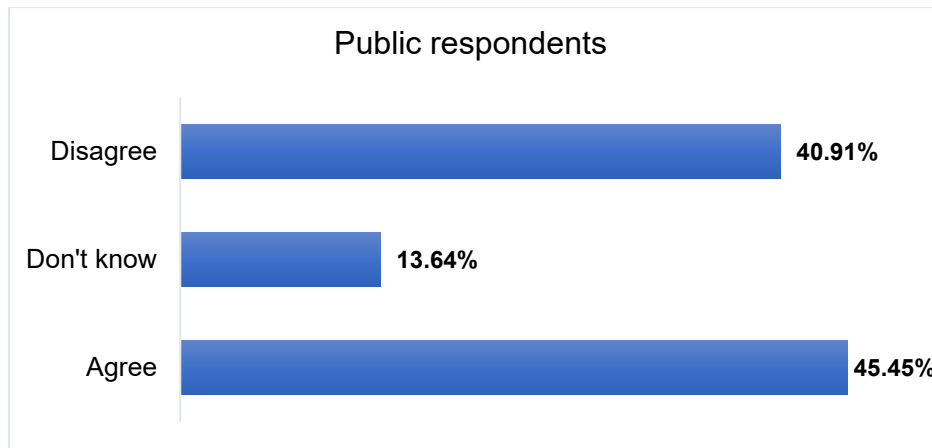
Key Issue 40 – Transportation

Reducing reliance on the private car.

Our Preferred Option – Option 40a: Introduce areas of parking restraint in our town centres and other areas, where appropriate to local circumstances.

We Asked

Do you agree with the preferred option? 22 respondents



We Asked

Do you agree that areas of parking restraint should be introduced within town centres and, if not, why? 19 respondents

Issues Raised

- General support was expressed however respondents also indicated difficulties with areas of parking restraint.
- A number of respondents advised that there is a need for increased investment in active travel.
- the introduction of areas of car parking restraint, whilst very unpopular would reduce the reliance on private cars overtime. However, for such a policy to work effectively, adequate public transport services need to be available in advance and phased in.
- The investment and improvements in public transport could be achieved throughout the Borough via developer contributions or legal agreements to provide areas for park and ride facilities.
- It was suggested that where possible, these areas are linked to an existing or proposed park and ride scheme. This will ensure that residents from smaller settlements or the rural area are able to access the shops and services within towns and choose more sustainable transport options.
- Some respondents viewed that areas of parking constraint may kill the town centre, that adequate public transport needs to be in place before these are imposed.

- Bus services on the Peninsula are particularly poorly timed and sparse, so that many people have little choice but to drive to Newtownards or Bangor in order to access public transport options, or to shop.
- Lack of parking in our major towns could push footfall to 'out of town' retail parks and gravely damage our already challenged high streets.
- There was concern on the impact on the town centre, it was stated that town centre retail needs easy and accessible parking, that town centre residents suffer from high commuter parking.

Consultation Body Comments

- 2.176. DFI Planning welcomed the preferred option in relation to the promotion of active travel networks and sustainable transport in all development and advised that coordination of the three aspects covered in Key Issues 10, 38 and 42 will be necessary to deliver a coherent and functional network.
- 2.177. The Northern Ireland Housing Executive (NIHE) would like the policy wording under transportation to contain a stronger emphasis on sustainable transport to encourage choices including walking, cycling and public transport to promote healthy lifestyles, minimise climate change and to improve connectivity for those who do not have access to a private car, including children and older people.

Consideration and way forward

- We note that this Key Issue generated a range of viewpoints expressed in responses from the public.
- There is some consensus in the need for investment in public transport and an appreciation that the north of the Borough has greater connectivity by public transport than the more rural Peninsula.
- Parking is an important issue for the Council generally and engagement across the Council will continue.
- We note the support from statutory consultees for this is a priority for Northern Ireland.
- The connectivity of community greenways, sustainable transport and active travel and disused transport routes is noted and continued engagement across

the Council and with statutory consultees will be undertaken to aid the delivery of these aims across all of the Borough.

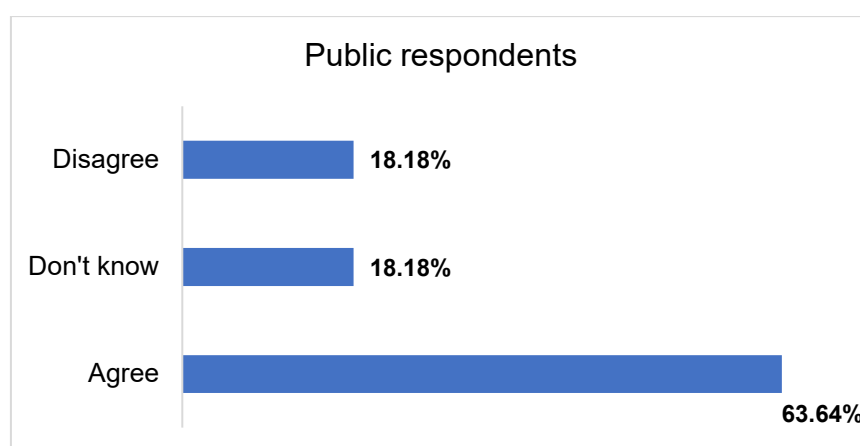
Key Issue 41 – Transportation

Protection of proposed routes for Transport Schemes.

Our Preferred Option: Option 41 – Continue to protect proposed routes for future transport schemes as identified within the extant area plans.

We Asked

Do you agree with continuing to protect proposed routes for future transport schemes that are identified in extant Development Plans? 22 respondents



Issues Raised

- There was support expressed for the protection of proposed transport routes.
- A number of transport routes were cited, including, Craigantlet Crossroads.
- A future Strangford Lough bridge at Portaferry.
- The importance and support for the strategic role of transport corridors which connect the Borough's towns, villages and small settlements and which must be sustained and enhanced where necessary.
- Respondents agreed that the Local Development Plan (LDP) should make use of the planned infrastructure improvements for the benefit of the entire Borough.

Consultation Body Comments

- 2.178. DFI Planning encouraged ongoing engagement with DFI TPMU, through this, the status of transport schemes listed in extant land use plans and transport plans will be considered, as well as, any new schemes.
- 2.179. DfI Rivers advised that flood risk must be considered for any proposed transport infrastructure schemes, such development should not be sited in areas prone to flooding.

Consideration And Way Forward

- We welcome the support for the protection of proposed routes for transport schemes. Engagement will continue with DFI TPMU to ensure that the Local Development Plan (LDP) incorporates planned infrastructure schemes.

Key Issue 42 – Transportation

Disused Transport Routes.

Our Preferred Option – Option 42: Identify and safeguard disused former transport routes for future use for transport or recreational, nature conservation or tourism related uses.

We Asked

Do you agree that disused transport routes should be identified and safeguarded for future use for transport or recreational, nature conservation or tourism related uses? 23 respondents

Issues Raised

- The proposal for disused former transport routes was viewed as beneficial to the environment and also improved connectivity to and from a site.
- They should be evaluated, upgraded and expanded as part of the plan process.
- This option was also viewed as a matter of priority and potentially useful for the greenway.

- Lines mentioned by respondents in particular were the 'old line' between Hollywood and Bangor, and a Newtownards to Donaghadee Greenway.

Consultation Body Comments

- 2.180. DfI Planning outlined that the document identifies only one option with regard to disused transport routes which seeks to identify and safeguard disused former transport routes for future use for transport or recreational, nature conservation or tourism related uses. The Department supports a co-ordinated approach between the identification and safeguarding of disused transport networks, the promotion of active travel networks, sustainable transport, and the identification and protection of greenways.
- 2.181. DfI Rivers outlined that in certain circumstances greenways can incorporate flood alleviation measures, an example of which is the Connswater Community Greenway in East Belfast.

Consideration And Way Forward

- We welcome the support for the safeguarding of disused transport routes.
- We will consider the linkages with active travel. Further consideration will be given at Local Policies Plan (LPP) stage to updating the depiction of disused transport routes across the Borough.

Sustainability Appraisal (SA) – Interim Report and Scoping incorporating Strategic Environmental Assessment (SEA)

The Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) consultation was included within the Preferred Options (POP) and offered opportunity for comment.

We Asked

Do you have any comments on the content or findings of the Sustainability Appraisal Interim or Scoping Reports? 20 responses

Issues Raised

- Views received on the SA included, that it does not realistically assess a range of growth options, and the reasons for selecting the alternatives dealt only with those outlined and rejected. Alternatives across the spatial growth issues should ensure the proposed strategy directs development to the most sustainable locations.
- The option of proportionate growth to the settlements appears to have been 'scored' unduly negatively and there was a failure to consider all reasonable alternatives for housing.

Consultation Body Comments

- 2.182. Historic Environment Division (HED) commented in relation to scoring the potential impacts of options in relation to effects on the Historic Environment objective. HED acknowledged that the scoring reflects the assessment of evidence provided by consultees and the experience and judgement of the panel carrying out the assessment and offered advice for future assessment and scoring in relation to the historic environment to make it more robust.
- 2.183. The Department of Agriculture, Environment and Rural Affairs (DAERA) Landscape offered comments on: Key Issue 2 'Settlement Hierarchy'; Key Issue 3 'Housing Allocation'; Key Issue 19 'Developing within areas of flood risk'; Key Issue 31 'Safeguarding Minerals'; Key Issue 37 'Tourism'; and Key issue 42 'Disused Transport Routes.'
- 2.184. Marine and Fisheries Division (MFD) advised that future Sustainability Appraisal (SA) Reports need to be more explicit in its recognition and consideration of effects on the marine area.

Consideration And Way Forward

- We will give consideration to all comments received and incorporate as appropriate into future Sustainability Appraisal (SA) Reports.

Site Specific Representations

- 2.185. A total of 29 site specific representations were received. Comments made within these responses have been incorporated into the appropriate sections of this report. The site-specific elements, however, cannot be actively considered at this stage.
- 2.186. We have advised respondents who submitted site specific representation within their letter of acknowledgement that it is too early in the LDP process for the consideration of individual sites and that site specific responses received will be noted. Development Plan Documents (both Plan Strategy and Local Policies Plan) will be subject to formal consultation and offer further opportunities for public engagement. Table 3 contains a list of site-specific representations received.

Preliminary Review of Operational Planning Policy

Issues Raised

- Thirteen responses from the public included comment on the preliminary review of Operational Planning Policy.
- It was written in very general terms and others.
- It didn't have sufficient detail.
- The plot size policy in North Down should be retained.
- There needs to be a robust and up-to-date evidence base to support future policies including anticipated trends to smaller household size and/or bungalows which would also include bespoke accommodation for an ageing population.

Consultation Body Comments

- 2.187. DFI Planning advised that the Council will be aware that work commenced on a priority review of the Strategic Planning Policy Statement (SPPS) focusing on strategic policy for Renewable Energy and Development in the Countryside.
- 2.188. The research reports for both Renewable Energy and Development in the Countryside have been received and officials are considering the research recommendations with a view to bringing forward advice for an incoming

Minister. As the Council will be aware, decisions to bring forward policy development would normally be taken by a Minister. As would be normal practice, the Department does not intend to publish the research reports at this time.

2.189. Historic Environment Division (HED) offered comprehensive policy specific comments for the Built Environment.

Consideration And Way Forward

- We will give consideration to all comments received and incorporate as appropriate into planning policies.
- Additional engagement will take place on a topic basis with relevant consultees and informal engagement will take place on draft planning policy as considered necessary in advance of the Draft Plan Strategy (dPS) publication.
- We will maintain and update a full suite of topic based technical supplements to accompany the publication of the dPS which will consider the latest available demographic information.

Table1 – Issues raised at Engagement Events

Bangor	Queens Parade and its impact on the town centre in terms of retailing, revitalisation and regeneration; also its impact on road width and car parking in the town centre; comparison between retailing in Bangor and Ards – with Ards being vibrant and Bangor derelict with just cafes and charity shops; discussion on how there could be better public participation on the Preferred Options Paper (POP); Development of the archaeological history of Bangor and the Borough; new Conservation Areas (CAs) and Areas of Townscape Character (ATCs); ATC Design Guides; Settlement hierarchy and strategy; Climate change impact and coastal policy and coastal development; Housing allocation and development of the countryside; Placemaking and Design; Landscape Character Assessments; Planning is too late for town centres; the need to focus on town centres; the need to have an imaginative and flexible approach to town centres given the current retail climate; positive and excited about the POP; Housing growth concentration; availability of infrastructure to cope with future growth; importance of the reduction of energy consumption with a fabric first approach; Lifetime Homes for the elderly; facilities for children in new developments; better parking at Bangor Train Station with a multi storey at bus park; the need for housing and social housing in Millisle; concerns on rural policy; the want for housing in the countryside.
Newtownards	Adding submissions beyond the questionnaire; the possible re-designation of lands at Portaferry Road from playing fields to commercial; how best to respond to the POP; settlement limits at Lisbane; demand for affordable housing in Lisbane; Developer contributions appear to be

	excessive; car parking and greenways as people have to park to use them; support for Park and Ride.
Donaghadee	Cost of Lifetime Homes; regeneration of Bangor hampered by lack of parking; Bangor Retail Core does not include upper part of High Street; Social Housing allocation; Housing Growth Indicator (HGI) seems too low; Bangor is an issue.
Hollywood	Co-working spaces more suitable as social spaces rather than economic/employment zones; does preferred option preclude town centre start-up/co-working; wording is exclusionary best place for such zonings is not within economic/employment zones; Key Issues 21/22 welcomed and supported; reference to Areas of Townscape Character (ATCs) not Conservation Areas (CAs); expectation that a review of CAs would come forward; can a map be put in showing ATCs and Areas of Village Character (AVCs); query over development limits and status of Planning Policy Statements (PPSs); Support for strategic objectives and options; what are population and growth targets?; importance of protecting open space as well as a desire to increase the areas; will rural policy change; concern re overdevelopment of stopping farming businesses; noise from turbines; query over Ardkeen becoming a settlement; supportive of encouraging growth and prosperity; pressure on merging settlements such as Helens Bay, Craigavad; importance of landscape wedges; transportation for newly zoned housing areas; increase in cramming; and plot size and retaining character of the area; parking issues in town and at railway halts; park and ride facilities are too small; planning approvals with one car parking space; not in support of predestination; development limits need to be robustly protected; Key Issue 8 Lifetime Homes is positive; supportive of Key Issue 20.

Comber	Amount of development within the town; issues with infrastructure namely traffic congestion and sewerage; concerns on position of new greenway; accessibility of rural areas; homes for the elderly.
Portaferry	Land should be set aside for start-up businesses; support for businesses; expansion of the settlement should be linear; lack of retail units in town centre; constraints put on businesses by Conservation Area; infrastructure issues including ferry times, the road to Ards, parking and monorail; move the existing bus depot; no single Strangford Lough policy; employment is seasonal; access to lough for rowing; stowage for boat owners; wind turbines should be restricted; tourism should be pushed; there should be meanwhile uses; the need to support businesses; Digital Connectivity for working from home; concern of standard of public realm; derelict /vacant properties in village; imbalance with larger towns such as Bangor.
Ballygowan	Ballygowan should be a town; poor infrastructure; Social Housing; health services; ageing population; park and ride, car share facilities; public realm; interest in Tourism; encourage living above shops.

Table 2 – List of Respondents

Ref	Name	Company
LDP/0001/E	Sean McHenry	Cornerstone – Vodafone/O2
LDP/0002/CS	Patricia Mackey	Ards and North Down Borough Council – Community Planning Service
LDP/0003/P	James Bailie	
LDP/0004/CS	Peter Lyons	
LDP/0005/P	Brian Timmons	Agent – NI Planning Approval
LDP/0006/E	Amanda Brownlow	
LDP/0007/EQ	Robin Totten	Translink
LDP/0008/EQ	Simon Bridge	
LDP/0009/E	John McElroy	Chartered Architect
LDP/0010/E	Helen Anderson	Director NIEA
LDP/0011/E	Rob Pearson	Nexus Planning
LDP/0012/P	Harry Blamphin	Secretary – Cultra Residents Association
LDP/0013/E	Celine Murray	CMB – Department for the Economy
LDP/0014/EP	Catherine Blease	Central Planning & Policy Manager NIHE
LDP/0016/E	Rosemary Richardson/Sharon Mahaffy	Head of Tourism ANDBC
LDP/0015/EP	Chris Tinsley	Senior Town Planning Consultant
LDP/0017/CS	Louise Robinson	
LDP/0018/CS	Andrew Gillespie	

LDP/0019/E	Lorraine Fleming	Head of Minerals and Petroleum Branch – Dept for the Economy
LDP/0020/CS	Peter McMullan	
LDP/0021/E	Rosemary Richardson/Sharon Mahaffy	Head of Tourism ANDBC
LDP/0022/P	Louise Robinson	
LDP/0023/E	Rory Sherwood-Parkin	Regional Affairs Manager (Northeast, Scotland, Northern Ireland) Virgin Media
LDP/0024/E	Áine McGuigan	Forestry Consultation and Engagement Co-ordination Forest Service
LDP/0025/E	Clare McGill	Head of Economic Development ANDBC
LDP/0026/CS	Kirsty Reid	19 Manns Road
LDP/0027/CS	Michael Dunlop	Urban Property Solutions Ltd
LDP/0028/E	Michelle Hill	RSPB NI
LDP/0029/E	Aidan Thatcher	Director of Planning and Building Control, Belfast City Council
LDP/0030/E	David Jones	N/A
LDP/0031/E	Fiona McKilligan	N/A
LDP/0032/E	Lesley & Stewart Joss	3 Dixon Road
LDP/0033/E	John Dickson	7 Ballymacormick Park
LDP/0034/E	Fionnuala Donaghy	N/A
LDP/0035/E	Sarah Donaghy	54 Ballymacormick Road

LDP/0036/E	Conall Donaghy	N/A
LDP/0037/E	Simon Sloan	Local Government Policy Division DfC
LDP/0038/CS	Richard Platt (1)	79 Milecross Road
LDP/0039/E	Richard Platt (2)	79 Milecross Road
LDP/0040/E	Alan Pritchard	N/A
LDP/0041/E	Trevor Cast	32 Ballymacormick Ave
LDP/0042/CS	Steven Agnew	North Down Green Party
LDP/0043/P	Mr Robinson	183 Millisle Road
LDP/0044/E	John Andrews – Chairman	Killinchy Rural Preservation Group
LDP/0045/E	Aidan Collins	Principal Environmental Planner Lightsource bp
LDP/0046/CS	John S Moore	Hollywood Conservation Group
LDP/0047/P	Noel Orr	OMNI Architects
LDP/0048/P	Richard and Louise Gordon	47 Whiterock Road
LDP/0049/EQ	Dermot Madden RIBA RIAS – Senior Architect [acting]	Heritage Records & Designation Branch HED
LDP/0050/EQ	Karen Gibson	49 Cranley Road
LDP/0051/EQ	Rachel Gibson	29 Movilla Street
LDP/0052/EQ	Robert Harvey Gibson	49 Cranley Road
LDP/0053/E	Cedric Wilson	12 Sandylands
LDP/0054/EQ	John Gibson	49 Cranley Road

LDP/0055/EQ	Jack Blakiston Houston – Director (Agent obo Mr James Clements)	Blakiston Houston Estate Company
LDP/0056/EQ	Jack Blakiston Houston – Director	Blakiston Houston Estate Company28 Carrowreagh Road
LDP/0057/P	Lucy Cooper	10 Ballymartin Road
LDP/0058/E	Andy Stephens OBO – Rock Structural PMC	Matrix Planning
LDP/0059/E	Michael Gillespie/Mark Hammond	Northern Ireland Environment Agency
LDP/0060/E	Barnaby Wharton –	Head of Policy & Regulation - NI Renewables Industry Group
LDP/0061/E	Jack Blakiston Houston – Director (Agent – Clandeboye Estate Company)	Blakiston Houston Estate Company
LDP/0062/E	Geoff Sloan	8A Gransha Road
LDP/0063/E	Andy Stephens OBO Kinnegar LLP	Matrix Planning
LDP/0064/E	Brian Gibson – Gibson Plus Ltd	158 Movilla Road
LDP/0065/E	Gillian McCoy	N/A
LDP/0066/E	Ian McCoy	14 Bangor Road
LDP/0067/E	Patrick Robinson	The Old Rectory
LDP/0068/E	John Mackey	N/A
LDP/0069/E	Conor Hughes	Island Civic Centre - Lisburn and Castlereagh City Council
LDP/0070/E	Dermot Monaghan – MBA Planning OBO Lidl (NI)	MBA Planning
LDP/0071/E	Maurice McCartney – Strangford Greens	c/o 48 Ann Street

LDP/0072/E	Victor Allister	11 Montgomery Manor
LDP/0073/E	Martin Kelly	1 Pavilions Office Park– Gravis Planning OBO EPISO 4 Flower S.a.r.l (c/o Ellandi LLP)
LDP/0074/E	Tomás Bradley – Eirgrid SONI	Transmission System Operator - Ireland.
LDP/0075/E	Quam Consulting Ltd OBO Portaferry Regeneration Ltd	N/A
LDP/0076/E	Michael Mullan	TSA Planning OBO John Andrews & Co LTD
LDP/0077/E	Michael Mullan	TSA Planning OBO Lotus Homes (UK) Ltd
LDP/0078/E	Dawn Miskelly	Ulster Wildlife
LDP/0079/E	Hilary Perry	N/A
LDP/0080/E	Jennifer Mawhinney	MBA Planning – MBA Planning OBO Comber Consortium (CC)
LDP/0081/E	Alex Perry	10 Millicent Park
LDP/0082/EP	David Mounstephen OBO – The Henderson Group	Fleming Mounstephen Planning
LDP/0083/EP	David Mounstephen OBO – The Murdoch Family	Fleming Mounstephen Planning
LDP/0084/E	Beverley Clyde	National Trust NI
LDP/0085/E	Diana Thompson	MBA Planning OBO Clandeboye Golf Club
LDP/0086/E	Gary Dodds	Turley's OBO The Watson Family
LDP/0087/E	Gary Dodds	Turley's OBO Chambers Homes

LDP/0088/E	Jenni McKeown	NI Electricity Networks
LDP/0089/E	Conor Cochrane – OBO Barnabas Ventures LTD	Clyde Shanks
LDP/0090/E	David Worthington – OBO Quarries Farm	Pragma Planning
LDP/0091/E	David Worthington –OBO Fraser Homes	Pragma Planning
LDP/0092/E	Mark Latimer – Invest NI	Invest Northern Ireland
LDP/0093/E	Gary Dodds – Turley OBO Boland Reilly Homes	Hamilton House
LDP/0094/E	Alistair Beggs	Department for Infrastructure
LDP/0095/E	David Worthington re Ards Shopping Centre	Pragma Planning
LDP/0096/E	Tom Adams	29 Ravara Road
LDP/0097/E	Erin Donaldson – OBO Northland Developments Ltd	Turley
LDP/0098/E	Erin Donaldson – Turley OBO Antrim Construction Company	Turley
LDP/0099/E	Charles Scott	Woburn Lodge Estate
LDP/0100/E	Glyn Roberts	Retail NI
LDP/0101/E	Michael Gordon – OBO The Gibson Family (Green Road)	Turley
LDP/0102/E	Michael Gordon – OBO Antrim Construction Company and Dunlop Development	Turley

LDP/0103/E	Michael Gordon – Turley Boland Reilly Homes and Dunlop Development	Turley
LDP/0104/E	Donaldson Planning lands at Newtownards Road Bangor Bowsley Village Conlig	Donaldson Planning
LDP/0105/P	Ian Wallace Honorary Secretary	Ards Rugby Football Club
LDP/0106/P	David John Sutherland – Sutherland Architects OBO Mr & Mrs Pattison	10 Cleaver Park
LDP/0107/P	Leslie Wright	43 Ballyblack Road
LDP/0108/P	Donaldson Planning Ref Bangor Road, Newtownards (AND03)	Donaldson Planning
LDP/0109/E	Donaldson Planning Ballygowan	Donaldson Planning
LDP/0110/E	Donaldson Planning Newtownards Road OBO the Bowmans	Donaldson Planning
LDP/0111/E	Donaldson Planning Donaghadee Road Groomsport	Donaldson Planning
LDP/0112/E	Donaldson Planning Green Rd Bangor Mr Magowan	Donaldson Planning
LDP/0113/E	Donaldson Planning Spires Holywood Pearson Family	Donaldson Planning
LDP/0114/E	Donaldson Planning Donaghadee Mr & Mrs Day	Donaldson Planning

LDP/0115/E	Donaldson Planning Millisle Dunleath Estates	Donaldson Planning
LDP/0116/E	Donaldson Planning Newtownards Road Greyabbey	Donaldson Planning
LDP/0117/E	Donaldson Planning Comber Rd – MARM Developments	Donaldson Planning
LDP/0118/E	Donaldson Planning Browns Brae Holywood	Donaldson Planning
LDP/0119/E	Donaldson Planning Kempe Stones/Milecross Road	Donaldson Planning
LDP/0120/E	Donaldson Planning Re Kiltonga Newtownards	Donaldson Planning
LDP/0121/E	Donaldson Planning re Green Road Bangor OBO The Bowmans	Donaldson Planning
LDP/0122/E	Donaldson Planning re Green Road Bangor	Donaldson Planning
LDP/0123/E	Donaldson Planning	Donaldson Planning
LDP/0124/CS	Lynda Sullivan	Friends of the Earth
LDP/0125/CS	Derek McLaughlin	32 Victoria Park
LDP/0126/CS	Matthew David Gibson	14 Glen Annesley Avenue
LDP/0127/CS	Georgina Pickering	10 Moyle Hill
LDP/0128/CS	Colleen McLaughlin	32 Victoria Park
LDP/0129/CS	Edward Pickering	10 Moyle Hill

LDP/0130/CS	Jacqueline Gibson	158 Movilla Road
LDP/0131/CS	Robert Dunlop	N/A
LDP/0132/CS	Megan Gibson	N/A
LDP/0133/CS	Susan Russell	158 Movilla Road
LDP/0134/CS	Boland Reilly Homes LTD	10 Ballycrochan Crescent
LDP/0135/CS	Turley OBO Boland Reilly Homes and Dunlop Developments – Hawe farm, Bangor	Hamilton House
LDP/0136/CS	Turley OBO The Gibson Family Green Road Bangor	Hamilton House
LDP/0137/CS	Turley OBO Antrim Cons Comp and Dunlop Devs – Ballymenoch Rd Holywood	Hamilton House
LDP/0138/CS	Dunlop Group	4-6 Brunswick Manor
LDP/0139/CS	Donaldson Planning	50A High Street
LDP/0140/CS	John Johnston	39A Cloughey Road
LDP/0141/CS	Makenzie-Dunlop	N/A
LDP/0142/CS	Ards Peninsula Coastal Erosion Group	47 Main Street
LDP/0143/E	Anne McCullough	3a The Point
LDP/0144/E	Gordon Best – Regional Director – MPANI (Late)	Unit 10 Nutts Corner Business Park
LDP/0145/E	Jonathan McCluskey – Director – Conexpo (NI) Ltd (Late)	T/A Miskelly Bros Ltd

LDP/0146/E	Julie Rainey (late)	N/A
LDP/0147/E	Joan Graham (late)	79 Ballymacormick Avenue
LDP/0148/E	Peter and Jacqui McBurney (late)	N/A
COR 2023/ 152d	Mr Hayes (late)	2 Orchard Lane Newtownards

Table 3 – Site Specific Responses Received

Agent Name	Owner Name	Location of site	Comments
Bill McAlister	Mr and Mrs K Menown	85 Bowtown Road	Request that this land be included within the Settlement Limit of Bangor
Donaldson Planning		two parcels of land at Moss Road and Carrickmannon Road, Ballygowan Ballygowan	Requesting the designation of these lands for housing (refers to a previous letter to Council on these lands)
Turley	Antrim Cons Comp and Dunlop Devs	Hamilton House Ballymenoch Road Holywood	
Donaldson		Bangor Road, Newtownards (AND03)	This submission supports the inclusion of lands at Bangor Road for development and comments on a number of the Key Issues set out in the POP.
Donaldson Planning	WM McCullough	Browns Brae Holywood	This submission supports the inclusion of these lands and provides comments on a number of the Key Issues set out in the POP.

Donaldson	MARM Developments	Planning Comber Rd Newtownards	This submission supports the proposal for a DOS and makes comments on a number of the Key Issues set out in the POP.
Donaldson Planning	Mr & Mrs Day	Lands at High Bangor Road, Donaghadee.	<p>This submission supports the inclusion of additional land for development and provides comments on a number of the Key Issues set out in the POP.</p> <p>A previous submission has been made to Council, requesting the designation of this land for residential development.</p>
Donaldson Planning		Donaghadee Road Groomsport	This submission supports the inclusion of more land in Groomsport and provides comments on a number of the Key Issues set out in the POP.
Donaldson Planning	Millisle Dunleath Estates	Lands at Moss Road, Lands at Ballywalter Road Millisle	It relates to two parcels of land at Millisle. Site location plans, showing the proposed extensions to the existing ADAP 2015 settlement limit.

Michael Gordon Turley OBO	The Gibson Family	Green Road Bangor	The principal concern of the family is that, as drafted, the POP would suggest that the growth of Bangor is likely to be restricted by a housing strategy which is over reliant on long standing unreliable sites and an aggregate of smaller housing sites. The sites that are currently making a housing contribution will be exhausted long before the end of the Plan period. Green Road masterplan map attached.
Donaldson Planning	Mr Magowan	Green Rd Bangor	Land which could be included within Bangor Settlement limit – Previous letter to Council on this site.
Donaldson Planning	The Bowmans	Green Road Bangor	This submission simply supports a logical revision to the settlement limit at Green Road to include this single dwelling.
Donaldson Planning		Green Road Bangor	This submission supports designation of the lands shown for housing and provides comments on a number of the Key Issues set out in the POP.

Turley OBO	The Gibson Family	Green Road Bangor	Green Road Bangor
Turley	Boland Reilly Homes and Dunlop Developments	Hawe farm Bangor	Hawe Road Bangor
Lucy Cooper		10 Ballymartin Road	I would request that the planning department would consider zoning this land to the east of Newtownards for development and having my lands allocated for housing.
Donaldson Planning		Kempston's/Mile Cross Rd	This submission supports the inclusion of lands in west Newtownards for development and comments on a number of the Key Issues set out in the POP.
Donaldson Planning		Kiltonga Newtownards	The northern part of this has been zoned as 'proposed industry' in the ADAP. However, it has the benefit of an extant planning permission for a care home. It is not suitable

			<p>for, nor will it be developed for industrial use. (NS32)</p> <p>The lands to the south, which run parallel with Milecross Road, would be suitable for housing development, perhaps with inclusion of some small-scale commercial business elements.</p>
Brian Timmons	Agent – NI Planning Approval	Adj. to 11 Victoria Road Ballyhalbert	Lands – potential Retirement Village
David John Sutherland – Sutherland Architects	Mr & Mrs Pattison	lands adj. to 185 Bangor Road, Newtownards	Request to rezone lands for housing
	Leslie Wright	lands adj. to 71 Ballygrainey Road Whinney Hill Holywood	Request that consideration be given to zoning these lands for housing
Donaldson Planning		Newtownards Road Greyabbey	The precise boundaries of any new allocation can be defined at the Local Policies stage of the Plan. However, the landowner has extensive land available to ensure that any new development can be of

			<p>high quality with potential for extensive buffer planting to provide a high level of integration.</p> <p>This submission supports the inclusion of more land for Greyabbey and provides comments on a number of the Key Issues set out in the POP.</p>
Donaldson Planning OBO	the Bowmans	Newtownards Road	<p>This land is already zoned in the Draft BMAP as BR06 for employment uses. The response supports re-designation of this site as a mixed-use zoning, and comments upon a number of Key Issues arising from the Council's Preferred Options Paper 2015-2030.</p>
Donaldson Planning		Lands at Nards Rd Bangor Bowsley Village Conlig	<p>Masterplan Bowsley village, including housing, industry units' retirement housing, facility.</p> <p>Q – was there a letter attached?</p>

Donaldson Planning	Pearson Family	Land at "The Spires" Holywood	This submission supports the inclusion of this land for development and provides comments on a number of the Key Issues set out in the POP.
	Louise Robinson	Lands at 25 Ravara Road Ballygowan, Newtownards BT23 6DH	I would ask that you consider zoning the lands for housing as you prepare and publish the new area plan.
	James Bailie	Ballyvester Farm Bog Road Portavogie	Wish to request that land at Bog Road, up to the 30mph speed limit is included within the settlement limit.
	Mr Robinson	183 Millisle Road	I wish land at Ballyvester Farm to be considered for ant future zoning in the area in the Area Plan.
	John McElroy	Gransha Road Bangor	Request that lands be all or in part zoned for housing.

Appendix 1 -Consultation

1st Consultation Press Advertisement

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Public Notices

Public Notice

Ards and North Down Borough Council

Full details of the following planning applications including plans, maps and drawings are available to view on the NI Planning Portal www.planningni.gov.uk or at the Council Planning Office or by contacting (028) 9182 4006. Whenever possible, written comments should be submitted within the next 14 days. We request comments as early as possible, but we must take account of any representations that raise material planning considerations received before the application is actually determined.

Please quote the application number in any correspondence and note that all representations made, including objections, will be posted on the NI Planning Portal. Please refer to the Council's guidance on how to comment on a planning application which is available on the Council's website www.ardsandnorthdown.gov.uk/planning-applications. The Schedule of Planning Applications being presented to the Council's Planning Committee on Tuesday 2 April 2015 is published on the Council's website on www.ardsandnorthdown.gov.uk/resident/planning. Please refer to the Council's guidance on 'Getting involved in Planning Committee meetings' available on the Council's website.

Initial Advertisements

Application No.	Location	Proposal
LA06/2019/0242/RM	Land to East of 25 Craigboy Road, Donaghadee	Single-storey dwelling with associated site access and landscaping works
LA06/2019/0243/F	Site adjacent to and West of 10a Ballygalget Road, Newtownards	New dwelling and garage - Change of house type from previous approval X2010/0157/RM, with access from existing entrance
LA06/2019/0261/F	Hillmount, 51 Stump Road, Ballywalter	Replacement Dwelling
LA06/2019/0267/F	30m SW of 51 Ballyblack Road, Newtownards	Infill dwelling and garage - change of house type from previous approval LA06/2016/0304/RM
LA06/2019/0273/O	73a Main Road, Cloughy	Off-site replacement dwelling
LA06/2019/0203/F	31 Hanover Chase, Bangor	Single-storey extension to rear of existing dwelling
LA06/2019/0268/F	Balloo Hill Centre, 21 Balloo Drive, Balloo Industrial Estate, Bangor	Change of use from mezzanine storage to new office, lobby, wc and open storage
LA06/2019/0252/F	Site 7 Vester Cove, Donaghadee	New dwelling (change of house type approved under X2003/1434/F)
LA06/2019/0230/RM	Land 6.5m SE of 15 Avonlea Park, Bangor	New two-storey detached dwelling and single detached garage with new boundary wall and entrance
LA06/2019/0271/F	1 Rosemary Crescent, Bangor	First floor dormer construction. Replace front roof canopy and render to section of front elevation of existing dwelling
LA06/2019/0222/F	23 Vestry Road, Ballygowan	Single-storey rear extension to dwelling and two-storey detached garage with Juliet balcony on side elevation
LA06/2019/0263/F	24 Brae Grove, Ballygowan	Single-storey rear extension
LA06/2019/0246/F	2 Carolsteem Gardens, Helens Bay	Single-storey rear extension
LA06/2019/0251/F	10 Woodcroft Park, Holywood	Single-storey front extension
LA06/2019/0253/F	3 Alexandra Park, Holywood	Demolition of existing single-storey rear return & garage and replace with single-storey extension to rear and side with a new single garage
LA06/2019/0247/F	Lands 60m SW of No. 5 Tullymagary Road, Newtownards	Erection of 9 No. 2 bed apartments (change of house types to site 93-101, previously approved under X2010/0054/F) and all other associated site works
LA06/2019/0255/F	76 Ballyroan Road, Newtownards	Extension and alterations to an existing outbuilding to provide ancillary accommodation, including increase in ridge height of accommodate first floor accommodation
LA06/2019/0266/F	129 Quarry Heights, Newtownards	Galvanised steel shed
LA06/2018/0933/F	80m NW of No. 41 Rowreagh Road, Kircubbin	Two-storey farm dwelling with integral double garage. (Amended Drawings)
LA06/2018/1052/RM	Between 30 and 32 Tullyhubbert Road, Moneyreagh, Newtownards	Infill site for two dwellings (Site location amended)
LA06/2019/0107/F	36a Drumreagh Road, Ballygowan	Two-storey side extension to dwelling to provide garage and first floor storage including retention of sun lounge. Erection of 2 no. replacement dwellings (revision of previously approved scheme X2003/0889/F) (Amended plans)
X2015/0117/F	157 & 161 Belfast Road, Comber	Retrospective change of design to previously approved roof under W2014/0220/F including first floor extension, new boiler flue to gable and new 2.4m high side boundary fence (Amended proposal)
LA06/2015/0748/F	11 Craigdaragh Park, Holywood	New dwelling house with detached garage and alterations to existing vehicular entrance from Croft Road (Amended Drawings)
LA06/2018/1308/F	4 Croft Road, Holywood	Light industrial unit to include workshop and store with associated car parking and hard landscaping (Amended Description)
LA06/2018/1247/F	129 Quarry Heights, Newtownards	Retrospective permission for stables/livery, menage with 6 No. floodlights, and associated parking/turning area (reconfiguration and amendments from previous approval- X2007/0638/F) (Amended Description)
LA06/2018/1259/F	480m SE of 1 Greengraves Road and 60m SW of 110 Kempstones Road, Newtownards	

Ards and North Down Borough Council

Ards and North Down Local Development Plan 2030

Publication of Preferred Options Paper (POP)

In accordance with Regulation 10 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Ards and North Down Borough Council hereby gives notice that its Local Development Plan Preferred Options Paper (POP) was launched on 25 March 2019. The public consultation is open from 28 March 2019 until 20 June 2019.

The POP is the first of three main public consultation documents that the Council will issue during the Local Development Plan (LDP) preparation.

It is designed to promote focused debate on key issues of strategic significance which are likely to influence the direction of future development within the Borough up to 2030. The POP outlines the vision and strategic objectives of the LDP, along with a set of key issues and the possible options available to address them, including the Council's 'preferred options'.

The POP is accompanied by supporting documents subject to public consultation which incorporate a Sustainability Appraisal (Scoping and Interim Reports), Strategic Environmental Assessment (SEA), and Section 75 Screening.

Availability of documents

The POP and accompanying documents, including topic-based Position Papers, can be viewed online at the Council's website at: www.ardsandnorthdown.gov.uk

The POP Consultation and other supporting documentation are also available to view in hard copy at the Planning Office, 2 Church Street, Newtownards, BT23 4AP, and the Town Hall, The Castle, Bangor, BT20 4BT during normal office hours (Monday to Thursday 9am-5pm; Friday 9am-4.30pm).

The POP and supporting documentation can be made available in hard copy or other formats upon request to 028 91824006 or planning@ardsandnorthdown.gov.uk

How to respond

An online Comments Sheet is available on the Council's website. Responses can also be forwarded to the Local Development Plan Team at 2 Church Street, Newtownards, BT23 4AP, or by email to planning@ardsandnorthdown.gov.uk

Public Engagement Events, Exhibition, Drop-in Information Sessions

There will be a number of events/sessions across the Borough, commencing in April 2019 as detailed below, at which Planning Officers will be available to answer questions on the LDP process and the POP.

The consultation period will close at 5pm on 20 June 2019.

Late representations will not be considered.

The outcome of the public consultation will inform the next stage in the Plan-making process: The Draft Plan Strategy.

Public Engagement

Details of the public engagement/exhibition/public drop-in sessions across the Borough are listed below:

Date	Venue	Times
Monday 8th April 2019	Comber Library, Newtownards Road, Comber, BT23 5AU	10.30am - 12.30pm
Wednesday 10 April 2019	Ballygowan Community Hall, Belfast Road, Ballygowan, BT23 6NA	6.30 pm - 8.30pm
Monday 15 April 2019	Donaghadee Community Centre, The Parade, Donaghadee, BT21 0HG	1.30 pm - 3.30pm
Wednesday 1 May 2019	Holywood Library, Sullivan Building, 86-88 High St, Holywood, BT18 9AE	1.30 pm - 3.30pm
Thursday 9 May 2019	Portlaffery Sports Centre, Cloughy Road, Portlaffery, BT22 1ND	6.30-8.30pm
Tuesday 14 May 2019	Ards Blair Mayne Health and Wellbeing Centre, 1 Dairy Hall Lane, Newtownards, BT23 4DB	1.30-3.30pm
Monday 20 May 2019	Project 24 (Lilac Pod 1), Queen's Parade, Bangor, BT20 3BH	1.30-3.30pm 6.30-8.30pm

Local Government (Miscellaneous Provisions) (NI) Order 1985

ENTERTAINMENTS LICENCE

Take notice that application dated 28th March 2019 has been made under Article 3 and Schedule 1 of the above Order for the renewal of an Entertainments Licence permitting: billiards, pool, snooker, or any other similar game, darts, dancing, singing or music or any other entertainment of a like kind at Bangor Football and Social Club, Glendebrye Road, Bangor BT20 3JT.

Representations in relation to the application may be made to Ards and North Down Borough Council, Town Hall, The Castle, Bangor by giving notice to the Council, stating in general terms the nature of the representation not later than 28 days after the date of application.

Local Government (Miscellaneous Provisions) (NI) Order 1985

ENTERTAINMENTS LICENCE

TAKE NOTICE that application dated 25th March 2019 has been made under Article 3 and Schedule 1 of the above Order for the renewal of an Entertainments Licence permitting: darts, dancing, singing or music or any other entertainment of a like kind, machines for entertainment and amusement at Betty Blacks, 13-15 High Street, Bangor, BT20 5PG.

Representations in relation to the application may be made to Ards and North Down Borough Council, The Castle, Bangor, BT20 4BT by giving notice to the Council, stating in general terms the nature of the representation, not later than 28 days after the date of the application.

Michael Brennan
02 Sandymount Green, Newtownabbey, BT36 3FB.

Local Government (Miscellaneous Provisions) (NI) Order 1985

ENTERTAINMENTS LICENCE

Take notice that application dated 25th March 2019 has been made under Article 3 and Schedule 1 of the above Order for the renewal of an Entertainments Licence permitting: billiards, pool, snooker or any other similar sport or game; darts; dancing, singing, music, or

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Public Notice

Ards and North Down Local Development Plan 2030 Publication of Preferred Options Paper (POP)

In accordance with Regulation 10 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Ards and North Down Borough Council hereby gives notice that its Local Development Plan Preferred Options Paper (POP) was launched on 25 March 2019. The Council recently identified an inadvertent omission from its online version of the POP which has implications in respect of compliance with the relevant regulations for its consultation exercise. To ensure that the Council has fully complied with the legal requirements of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, it is necessary to run the consultation period in a full 12-week manner from Friday 17 May 2019.

The public consultation is now open for a period from 17 May 2019 until 4.30 pm 9 August 2019.

Representations received after this time will not be accepted.

The POP is the first of three main public consultation documents that the Council will issue during the Local Development Plan (LDP) preparation.

It is designed to promote focused debate on key issues of strategic significance which are likely to influence the direction of future development within the Borough up to 2030. The POP outlines the vision and strategic objectives of the LDP, along with a set of key issues and the possible options available to address them, including the Council's 'preferred options'.

The POP is published along with a number of supporting documents which are also the subject of public consultation until 4.30pm Friday 9 August 2019. These include a Sustainability Appraisal (Scoping and Interim Reports, incorporating Strategic Environmental Assessment (SEA), and Habitats Regulation Assessment (HRA) Baseline Study) and Section 75 Screening.

Availability of documents

The POP and accompanying documents, including topic-based Position Papers, can be viewed online at the Council's website at: www.ardsandnorthdown.gov.uk

The POP Consultation and other supporting documentation are also available to view in hard copy at the Planning Office, 2 Church Street, Newtownards, BT23 4AP, and the Town Hall, The Castle, Bangor, BT20 4BT during normal office hours (9am–5pm, Monday–Thursday and 9am–4.30pm on Friday).

The POP and supporting documentation can be made available in hard copy and other formats upon request to 028 91824006 or planning@ardsandnorthdown.gov.uk

How to respond

An online Comments Sheet is available on the Council's website. Responses can also be forwarded to the Local Development Plan team at 2 Church Street, Newtownards BT23 4AP, or by email to planning@ardsandnorthdown.gov.uk

Public Engagement Events, Exhibition, Drop-in Information Sessions

A number of events/sessions across the Borough, commenced in April 2019 as detailed below, at which Planning Officers will be available to answer questions on the LDP process and the POP.

The new 12-week period for the submission of representations will run from 17 May to 4.30 pm on 9 August 2019.

The outcome of the public consultation will inform the next stage in the Plan-making process: The Draft Plan Strategy.

Details of the first set of public engagement/exhibition/public drop-in sessions across the Borough are listed below:

Date	Venue	Times
Monday 8th April 2019	Comber Library, Newtownards Road, Comber, BT23 5AU	10.30am–12.30pm
Wednesday 10 April 2019	Ballygowan Community Hall, Belfast Road, Ballygowan, BT23 6NA	6.30 pm–8.30pm
Monday 15 April 2019	Donaghadee Community Centre, The Parade, Donaghadee, BT21 0HG	1.30 pm–3.30pm
Wednesday 1 May 2019	Hollywood Library, Sullivan Building, 86–88 High St, Holywood, BT18 9AE	1.30 pm–3.30pm
Thursday 9 May 2019	Portaferry Sports Centre, Cloughy Road, Portaferry, BT22 1ND	6.30–8.30pm
Tuesday 14 May 2019	Ards Blair Mayne Health and Wellbeing Centre, 1 Dairy Hall Lane, Newtownards, BT23 4DB	1.30–3.30pm 6.30–8.30pm
Monday 20 May 2019	Project 24 (Lilac Pod 1), Queen's Parade, Bangor, BT20 3BH	1.30–3.30pm 6.30–8.30pm

Further opportunities to speak with Planners at the public engagement/exhibition/public drop-in sessions shall take place at the venues and times below:

Date	Venue	Times
Monday 3 June 2019	Newtownards Library, Queen's Hall, Regent Street, Newtownards, BT23 4AB	6–8 pm
Wednesday 5 June 2019	Ballygowan Community Hall, Belfast Road, Ballygowan, BT23 6NA	6–8 pm
Monday 10 June 2019	Bangor Carnegie Library, Hamilton Road, Bangor, BT20 4LH	6–8pm
Tuesday 11 June 2019	Comber Library, Newtownards Road, Comber, BT23 5AU	6–8pm
Thursday 13 June 2019	Portaferry Sports Centre, Cloughy Road, Portaferry, BT22 1ND	6–8pm
Wednesday 19 June 2019	Donaghadee Community Centre, The Parade, Donaghadee, BT21 0HG	6–8pm
Thursday 20 June 2019	Hollywood Library, Sullivan Building, 86–88 High St, Holywood, BT18 9AE	6–8pm

**SPECTATOR CLASSIFIEDS
GET RESULTS
Telephone: 028 9127 0270**

Local Government
(Miscellaneous Provisions)
(NI) Order 1985

ENTERTAINMENTS LICENCE

Take notice that application dated 16th May, 2019, has been made under Article 3 and Schedule 1 of the above Order for the renewal of an Entertainments Licence permitting: billiards, pool, snooker or any similar game; darts; dancing, singing or music; or any other entertainment of a like kind; machines for entertainment and amusement at Meadowbank Social and Recreational Club, 38 The Parade, Donaghadee, BT21 0HE. Representations in relation to the application may be made to Ards and North Down Borough Council, The Castle, Bangor, BT20 4BT, by giving notice to the Council stating in general terms the nature of the representation not later than 28 days after the date of application.

David Porter

2 Shingle Bay, Edgewater, Donaghadee, BT21 0EL

Local Government
(Miscellaneous Provisions)
(NI) Order 1985

ENTERTAINMENTS LICENCE

TAKE NOTICE that application dated 7th May 2019 has been made under Article 3 and Schedule 1 of the above Order for the renewal of an Entertainments Licence permitting: Dancing, singing or music or any other entertainment of a like kind at The Groomsport Inn, 26 Main Street, Groomsport, BT19 6JR. Representations in relation to the application may be made to Ards and North Down Borough Council, The Castle, Bangor, BT20 4BT by giving notice to the Council, stating in general terms the nature of the representation, not later than 28 days after the date of the application.

Amanda O'Kane
16 Dunkeel Chase, Bangor, BT19 6RL



Happy 30th birthday little sister!! Love all the family xx

Would anyone having information or knowledge as to the whereabouts of Miss Margaret (Marti) Keenan formerly of 35 Towervision Avenue, Bangor, County Down BT19 6BB and Norman Maguire formerly of 3 Alexandra Park, Holywood, County Down please contact Keown Solicitors 19 Cregagh Road, Belfast BT6 8PX telephone number 028 9045 6042

Ards and North Down
Borough Council



Planning applications

Full details of the following planning applications including plans, maps and drawings are available to view on the NI Planning Portal www.planningni.gov.uk or at the Council Planning Office or by contacting (028) 9182 4006. Whenever possible, written comments should be submitted within the next 14 days. We request comments as early as possible, but we must take account of any representations that raise material planning considerations received before the application is actually determined.

Please quote the application number in any correspondence and note that all representations made, including objections, will be posted on the NI Planning Portal. Please refer to the Council's guidance on how to comment on a planning application which is available on the Council's website www.ardsandnorthdown.gov.uk/planning-applications. The Schedule of Planning Applications being presented to the Council's Planning Committee on Tuesday 4 June 2019 will be published on the Council's website on www.ardsandnorthdown.gov.uk/residentplanning on 21st May 2019. Please refer to the Council's guidance on 'Getting involved in Planning Committee meetings' available on the Council's website.

Initial Advertisements

Application No.	Location	Proposal
LA06/2019/0431/F	21 Moyle Hill, Ballywater	Provision of second storey above existing rear extension
LA06/2019/0432/F	188 Main Road, Cloughy	Two-storey rear extension
LA06/2019/0435/F	267 Ballywater Road, Millisle	Conversion from single storey to a one and half storey dwelling and replacement garage
LA06/2019/0443/F	32 Greyabbey Road, Ballywater	Single-storey side extension
LA06/2019/0456/F	187 Moss Road, Millisle	Retention of farm dwelling - Non-compliance with Condition 2 of Planning Approval X/2003/0203F - 'The occupation of the dwelling shall be limited to a person solely or mainly employed or last employed in the locality in agriculture as defined in Article 2(2) of the Planning (Northern Ireland) Order 1991, forestry or fishing (including any dependants of such person residing with him) or a widow or widower of such a person.'
LA06/2019/0412/F	1 Rathgill Meadows, Bangor	Single-storey rear extension to include alterations to existing windows.
LA06/2019/0413/F	40 Ballyvester Grove, Bangor	Single-storey rear extension
LA06/2019/0429/F	18 Rathgill Park, Bangor	Single-storey rear extension
LA06/2019/0430/F	Unit 21J Enterprise Road, Bangor	Increase in first floor accommodation, modifications to internal layout and installation of new windows
LA06/2019/0428/F	5 Beaumont Grove, Bangor	Two-storey side extension
LA06/2019/0438/F	25 and 27 New Street, Donaghadee	Change of use from shop to café at ground floor of No. 27, and amalgamation of No. 25 and No. 27 at ground floor to create a single café unit
LA06/2019/0445/F	1A Cypress Park, Donaghadee	Single storey side extension
LA06/2019/0410/F	49 Manor Avenue, Bangor	Two-storey side extension, demolition of existing conservatory and erection of replacement sunroom to rear
LA06/2019/0394/F	95 Old Ballygowan Road, Comber	Attic conversion with dormer to rear.
LA06/2019/0416/F	4 Ballybunden Road, Killynchy	Two-storey side and rear extension
LA06/2019/0439/F	1 Darragh Crescent, Comber	Single-storey rear extension and ramp to side of dwelling
LA06/2019/0444/F	27 Heathmount Crescent, Comber	Single-storey side extension
LA06/2019/0415/F	28 Woodlands, Holywood	Demolition of existing sunroom and garage to facilitate two-storey rear extension with roof garden balcony
LA06/2019/0418/F	50 Belfast Road, Holywood	Single-storey rear extension to provide additional area to private day nursery
LA06/2019/0419/F	10 Kintyre Avenue, Holywood	Roof space extension
LA06/2019/0433/F	6a Cultra Terrace, Holywood	Replacement dwelling with new access onto Cultra Avenue
LA06/2019/0434/O	84 Ballymoney Road, Holywood	Demolition of vacant gospel hall and provision of 2 No. dwellings under policy 24.19.9
LA06/2019/0442/F	16a Old Seahill Road, Holywood	Single-storey rear extension to afterschool classroom
LA06/2019/0446/F	3 Beechcroft Park, Newtownards	Two-storey side extension

Re-Advertisements

Application No.	Location	Proposal
LA06/2019/0109/F	240m SSW of 4A Drumhirk Avenue, Newtownards	Farm dwelling (Amended access)
LA06/2019/0121/F	Lands between 12 and 35 Queen's Parade Bangor	Variation of condition 1 of planning approval LA06/2018/0137/F (Extend temporary permission for 6 no. urban art pods) from - The development, hereby permitted, shall be removed and the land restored to its former condition on or before 24 April 2019 - to - The development, hereby permitted, shall be removed and the land restored to its former condition on or before 24 April 2021.
LA06/2019/0122/F	Lands between 12 and 35 Queen's Parade Bangor	Variation of condition 1 of planning approval LA06/2016/0885/F (Extend temporary permission for an aluminium framed temporary structure with PVC roof to be erected over an event space at the centre of Project 24, a public space used for community engagement through art) from - The permission hereby granted shall be for a limited period of 5 years only and shall expire on or before 30th June 2019 to - The permission hereby granted shall be for a limited period of 2 years only and the structure hereby approved shall be removed from the site on or before 30th June 2021.
LA06/2018/1165/F	20m South of 50 Thomy Hill Road, Killynchy	Conversion and extension of an existing outbuilding to provide tourist accommodation consisting of 1 No. self-catering unit (Amended description)
LA06/2019/0215/F	1 Prospect Park, Ballygowan	Erection of car-port to side and rear of dwelling and retrospective permission for boundary wall (max 3.5m) and 1.2m boundary fence, and proposed extension to fence (Amended proposal)
LA06/2019/0356/F	21 Ballycreely Road, Comber	Retention of Dwelling - Non-compliance with condition 4 of planning approval X/1995/0828 - This proposal shall ensure for the benefit of Mr Geoffrey Coey only and shall not ensure for the benefit of the land. The occupation of the dwelling hereby permitted shall be limited only to Mr Geoffrey Coey (including any dependants residing with him) unless permission is granted by the Department on an application in that behalf. (Amended Description)
LA06/2017/1033/F	21 Bridge Road South Helen's Bay	Demolition of existing buildings, removal of all above and underground waste remediation of site, erection of 11 No. dwellings and 4 No. apartments, provision of open space with landscaping and associated site works. (Amended access proposals and additional supporting information received)
LA06/2018/0493/F	Immediately east of 1 Seahill Road, Holywood	Erection of Dwelling with access via existing private road and creation of new access to rear (Change of house type in substitution of existing approval W/2014/0488/F) (Amended proposal and supporting information)
LA06/2019/0224/F	20 Torgrange, Holywood	Demolition of existing dwelling and garage and construction of a single dwelling with attached garage (Amended Plans)
LA06/2018/1259/F	480m South East of 1 Greengraves Road and 60m South West of 110 Kempstones Road, Newtownards	Retrospective permission for stables/livery, menage with 6 No. floodlights, and associated parking/turning area (Reconfiguration and amendments from previous approval: X/2007/0536/F) (Amended red line)

Ards and North Down Borough Council POP Response Questionnaire

Overview

Ards and North Down Borough Council is pleased to present the Preferred Options Paper (POP) marking an important initial stage in the development of the Borough's first Local Development Plan (LDP).

The Preferred Options Paper is an opportunity for discussion on the matters which the LDP will deal with through the Plan Strategy and Local Policies Plan. The LDP shall seek to present a sustainable future for our Borough, by providing the land required for homes and jobs needed in a way that respects the unique historic and natural environment of our Borough.

The Preferred Options Paper (POP) is the first formal stage in the preparation of the LDP, and the first of three main public consultation documents that we will issue during the Plan process. The POP is designed to promote focused debate on key issues of strategic significance which are likely to influence the direction of future development within our Borough to 2030.

The Council recently identified an inadvertent omission from its online version of the published POP. This has implications in respect of compliance with the relevant regulations for its consultation exercise.

To ensure that the Council has fully complied with the legal requirements of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, it is necessary to commence consultation anew from Friday 17 May 2019 to 4.30pm on the 9th August 2019.

Closed 9 Aug 2019

Opened 16 May 2019

Contact

LDP Team

0300 013 3333

planning@ardsandnorthdown.gov.uk

Appendix 2 – Typical Event Setup



LAUNCH OF CONSULTATION ON LOCAL DEVELOPMENT PLAN PREFERRED OPTIONS PAPER

The Council has published its Local Development Plan Preferred Options Paper (POP) and is encouraging the local community to provide feedback to ensure that forthcoming strategies are a true reflection of local views.

The POP represents the start of formal work by the Council on the preparation of the Local Development Plan (LDP) for the Borough. The LDP will detail how the Borough should grow over the next 15 years and will identify how land is used, what will be built and where, whilst protecting our environment. The POP is designed to promote discussion and encourage feedback on key issues that are likely to influence the direction of the new Plan. It outlines the vision and strategic objectives along with a set of key issues and associated options for addressing them.



Stephen Reid (Ards and North Down Borough Council Chief Executive), Susie McCullough (Director of Regeneration, Development and Planning), Councillor Richard Smart (Mayor of Ards and North Down) and Leona Maginn (Principal Planning and Technical Officer)

Speaking at the launch event on 25 March 2019, Mayor, Councillor Richard Smart, said: "Planning affects all around us; where we live, work, shop and play, even how we get around. If you are interested in your area, street or own property, then the Local Development Plan and this first consultation document of the Preferred Options Paper will be relevant to you."

The future Local Development Plan will be one of the most important things to consider when deciding planning applications in the future. For example, if an area of land is shown as a housing site in the LDP, it means the principle of building houses on the land has already been accepted, even before any application for planning permission is made.

The same is true for land shown as retail and employment. That is why it is important for the local community and business owners to get involved and make their views known at the Preferred Options stage.

Ann McCullough, Head of Planning, added: "For many, the first time they come across a plan and planning policy is at a time that they wish to comment on a planning application so it is important to get involved now."

"I would encourage our communities and all stakeholders who have an interest in the future development of our Borough to get involved in the Local Development Plan process from the outset."

"The more people who take part by giving views on the POP, the more the forthcoming Plan Strategy and Local Policies Plan will be a true reflection of local views."

The Preferred Options Paper document, together with the associated documents, can be viewed and downloaded from the [Council website](#).

The consultation period for the Preferred Options Paper will run for a period of 12 weeks from 28 March 2019. All responses must be in writing and received by 5.00pm on the 20 June 2019.

Appendix 4 – Plan Drop In Event Dates Advert

**Ards and North Down
Borough Council**

Public Notice



Ards and North Down Local Development Plan 2030

Publication of Preferred Options Paper (POP)

In accordance with Regulation 10 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Ards and North Down Borough Council hereby gives notice that its Local Development Plan Preferred Options Paper (POP) was launched on 25 March 2019.

The Council recently identified an inadvertent omission from its online version of the POP which has implications in respect of compliance with the relevant regulations for its consultation exercise. To ensure that the Council has fully complied with the legal requirements of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, it is necessary to run the consultation period in a full 12-week manner from Friday 17 May 2019.

The public consultation is now open for a period from 17 May 2019 until 4.30 pm 9 August 2019.

Representations received after this time will not be accepted.

The POP is the first of three main public consultation documents that the Council will issue during the Local Development Plan (LDP) preparation.

It is designed to promote focused debate on key issues of strategic significance which are likely to influence the direction of future development within the Borough up to 2030.

The POP outlines the vision and strategic objectives of the LDP, along with a set of key issues and the possible options available to address them, including the Council's 'preferred options'.

The POP is published along with a number of supporting documents which are also the subject of public consultation until 4.30pm Friday 9 August 2019. These include a Sustainability Appraisal (Scoping and Interim Reports, incorporating Strategic Environmental Assessment (SEA); and Habitats Regulation Assessment (HRA) Baseline Study) and Section 75 Screening.

Availability of documents

The POP and accompanying documents, including topic-based Position Papers, can be viewed online at the Council's website at: www.ardsandnorthdown.gov.uk

The POP Consultation and other supporting documentation are also available to view in hard copy at the Planning Office, 2 Church Street, Newtownards, BT23 4AP, and the Town Hall, The Castle, Bangor, BT20 4BT during normal office hours (9am–5pm, Monday–Thursday and 9am–4.30pm on Friday).

The POP and supporting documentation can be made available in hard copy and other formats upon request to 028 91824006 or planning@ardsandnorthdown.gov.uk

How to respond

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Public Engagement Events, Exhibition, Drop-In Information Sessions

A number of events/sessions across the Borough, commenced in April 2019 as detailed below, at which Planning officers will be available to answer questions on the LDP process and the POP.

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The outcome of the public consultation will inform the next stage in the Plan-making process: The Draft Plan Strategy.

Details of the first set of public engagement/exhibition/public drop-in sessions across the Borough are listed below:

Date	Venue	Times
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Further opportunities to speak with Planners at the public engagement/exhibition/public drop-in sessions shall take place at the venues and times below:

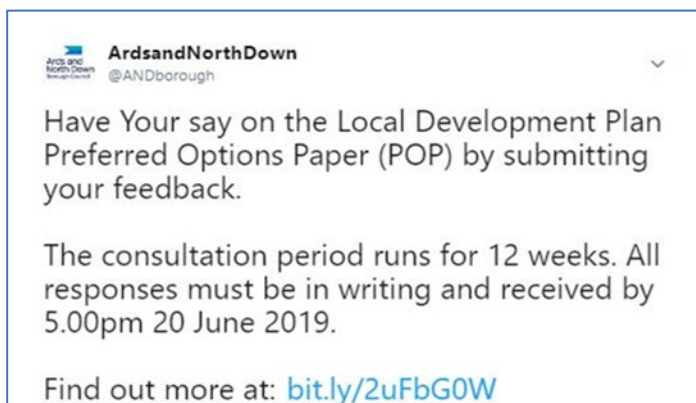
Date	Venue	Times
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Appendix 5 – Social Media

Facebook



Twitter



Appendix 6– Consultation Hub

Page 1 of 49

Closes 20 Jun 2019

This service needs
[cookies enabled](#).

Respondent Information

Thank you for taking the time to read and engage with the consultation on the POP. It is not necessary for you to answer every question, please feel free to provide your comments on areas of interest, including areas that you support

Anonymous comments or comments which do not directly relate to the POP will not be considered as part of the consultation process.

1. Name

2. Address

Please provide preferred contact details, organisation or client address

3. Telephone Number

This Privacy Notice covers the preparation and development of the Local Development Plan only.

The type of personal information we collect

We currently collect and process the following information:

- name, address details, phone number, email address and signatures.

Why we collect your personal information; how we manage and use this information.

The Council will process personal information you provide to it in your written or electronic submissions and communications with the Council.

We use the information that you have given us in order to:

- To enable the preparation of the Council's Local Development Plan;
- To facilitate public participation in the Local Development Plan process as well as other section functions such as Community Development;
- To send you updates and/or notify you about changes in the process;
- To seek clarification on any matters you have raised with the Council; and
- To fulfil its responsibilities to comply with any applicable legislation.

Under the UK General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

(a) We have a legal obligation.

(b) We need it to perform a public task.

Local Development Plan: Representations Database

Under **The Planning (Local Development Plan) Regulations (Northern Ireland) 2015** the Council is legally obliged, during the Plan preparation, to make the following documents available for public comment:

- Preferred Options Paper (POP);
- Plan Strategy (PS) ; and

- Local Policies Plan (LPP).

Representations (that is, responses submitted to the public consultation) received during the public consultation stages of the Plan Strategy and Local Policies Plan, must be made available for public inspection, both in hard copy, and on the Council's website.

We may share this information internally with relevant Council officers, where the business and legal framework requires or allows it.

You should note, however, information you provide will be shared with the Department for Infrastructure (DfI) and an Independent Examiner (a third party) as part of the submission of the Local Development Plan for Independent Examination. A Programme Officer will also have access to this information during the Independent Examination stages of the Plan preparation.

How we store your personal information

We shall only retain your data for as long as is necessary to process your representation and/or correspondence as part of the Plan preparation or for the purposes of other functions required by this section of the Council. Your information will be disposed of in a secure manner when no longer needed. The periods for retention of information, specifically relating to Planning, are specified in the Council's Retention and Disposal Schedule.

Go Vocal Platform (online form)

The Council uses Go Vocal as a platform for digital engagement and as a means to submit representations. Personal data will be securely stored by Go Vocal.

As part of using the Go Vocal platform to submit a representation, if you provide permission by accepting cookies on the Platform, Go Vocal and its third-party processors acting on its behalf collect information about the usage of the Platform to assess its proper functioning and security. As a result, Go Vocal may collect technical information such as your IP address and browser details. Go Vocal may also gather usage data to improve its services. You can opt out of this collection at all times in your Cookie Settings.

GoVocal has a Privacy Notice that can be found here on the [Go Vocal website privacy page](#).

Your rights and responsibilities

Please ensure that the information you submit is accurate and correct. Do not include personal information about third parties (including family members) unless you have told the individual concerned and they agree to it being supplied. Tell us as soon as possible if any of the personal information you have provided changes. Documents submitted as part of a representation and/or correspondence may be subject to copyright law, even if they have been available on the internet. You should only use such documents for

personal research purposes. The Council, in making the documents available, does not constitute permission for you to breach any copyrights that may exist on them.

Complaints

If you have any concerns about our use of your personal information, you can make a complaint to us.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO contact details are as follows:

- ICO website: www.ico.org.uk
- ICO self-service portal: <https://ico.org.uk/make-a-complaint/>
- Helpline: 0303 123 1114