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## Regional Planning Policy and Casework

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Your Ref:  
Our Ref: 04/26

13 March 2026

Dear Leona

### **ARDS AND NORTH DOWN BOROUGH COUNCIL – DRAFT PLAN STRATEGY - RECONSULTATION**

I refer to the formal public reconsultation on Ards and North Down Borough Council's (ANDBC) Draft Plan Strategy, which was launched on 16 January 2026 for 8 weeks, with a closing date of 16 March 2026. The Council consulted with the Department for Infrastructure (DfI) in accordance with Regulation 15 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

Following the Council's decision to undertake a fresh consultation to address an administrative error beyond the Council's control, the Department is resubmitting its response in accordance with the new consultation.

The Plan Oversight Team has coordinated a combined response on behalf of relevant business areas within the Department.

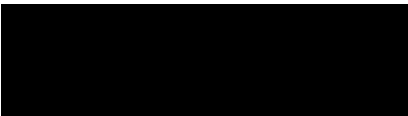
Please find attached the following representations:

- Regional Planning Policy and Casework Directorate (Strategic Response and Annex 1);

- Transport Planning and Modelling Unit (Transport and Roads Asset Management);
- Roads Southern Division (Transport and Roads Asset Management);
- Rivers Directorate;
- Water and Drainage Policy Division; and
- Sustainable Drainage Directorate.

The Department acknowledges the Council's constructive engagement with officials to date and looks forward to further engagement as the process moves forward.

Yours sincerely



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**DR KATHRYN McFERRAN**  
Director

**Enc(s)**

## Annex 1 – Additional DFI comments

### General

#### General Principles Policy for all Development

##### GP 1 – General Principles

1. The General Principles policy is at the forefront of the plan strategy and is a thread which runs through the whole document. It will be applied consistently to all development proposals across the Borough. The Department welcomes the Council prioritisation of the precautionary approach within GP1, reflecting SPPS paragraph 3.9.

### Planning Agreements

#### PA 1 – Planning Agreements

2. The Department welcomes this policy and J&A and would suggest that the Council's own legal advisors are consulted upon this policy provision within the LDP document. Dfi would also recommend the addition of a final sentence for clarity (in bold). Amended policy wording would read as follows:

*“Voluntary Contributions*

*6.7 In some circumstances community benefits may be offered on a voluntary basis by developers to communities likely to be affected by a development. Whilst the Council is committed to ensuring that local communities benefit from development schemes in their area, such community benefits cannot be considered material considerations in decision- taking and are distinct from developer contributions and planning conditions. **This type of voluntary contribution is secured by a separate agreement (not a planning agreement) between a developer and the affected community.**”*

3. The Department would recommend the removal of the word “To” in the 3rd bullet point of paragraph 6.2 and notes a small typo at paragraph 6.4, 4th bullet point which should read “enabling”.
4. The Department would also recommend that the Council consider paragraph 6.241

of the SPPS edition 2 and make any amendments as a result of the updated regional policy.

## **Housing**

5. The Department welcomes policies HOU 1, 5, 9, 12, 13, 14, 15, 16, and 17 and would make the following comments in respect of the following housing policies:

### **HOU 2 – Design of New Residential Development**

6. HOU 2 'Design of New Residential Developments' relates to the design of new residential development, establishing principles in including high quality design, respect for context, provision of public open space and support for active travel. There is strong alignment with the SPPS (p70) which highlights that good design should be encouraged everywhere and that all new housing developments should demonstrate a high quality of design, layout and landscaping.
7. The policy also draws upon retained planning policy in extant PPS 7 'Quality Residential Environments' and its Addendum 'Safeguarding the Character of Established Residential Areas. The approach to consolidating/amalgamating these policies has resulted in a very comprehensive policy on design, however the policy box and accompanying J&A is lengthy. The Council should consider opportunities to further rationalise and streamline the policy and J&A using more concise language, bullet points & numbering. The Department considers this could improve clarity of the policy overall and its ease of use when it is applied to the assessment of development proposals.

### **HOU 3 – Affordable Housing**

8. HOU 3 Affordable Housing requires at least 20% affordable housing on developments of 5 housing units or more and on sites of 0.1 ha or more. The approach takes account of the SPPS objectives in relation to mixed tenure development and balanced communities (p 70, SPPS) and complements the advice in the SPPS that the LDP will be the primary vehicle to facilitate any identified need through zoning land or identifying Key Site Requirements. This approach does not preclude other sites coming forward through the development management process. In this context of the SPPS and wider Executive strategies including the Housing Supply Strategy, the Department

supports the approach of the Council which reflects that of other councils and aims to maximise the delivery of additional affordable homes within mixed tenure balanced communities.

9. Specifically in relation to the issue of commuted sums as an alternative to offsite provision, the policy J&A at paragraphs 7.86 and 7.87 could adopt a clearer hierarchy that explicitly states that, where justified, off-site provision is always preferred to commuted payments. Specifically in relation to the calculation of commuted payments, the policy establishes the welcome principle that these should equate to the cost of delivering the same number of affordable units that would have been required on-site. However, the policy J&A lacks procedural detail in relation to when the payment of commuted sums would be triggered (before occupation of the approved market housing or in staged payments for example). In relation to off-site provision, it is unclear if the Council will require the applicant to have secured the required amount of off-site provision prior to the occupation of the market housing development. These issues may be best addressed through SPG to the plan strategy.
10. The Department notes on p 508 of the draft Plan Strategy inclusion of a definition for social housing and would request clarification on the sourcing of this and whether presence of this within the Glossary is necessary. DfI also notes reference to the Department of Social Development (DSD), however the Council will be aware that in May 2016 the DSD was dissolved and its functions were absorbed into the new Department for Communities (DfC).

#### **HOU 4 – Accessible and Adaptable Homes**

11. HOU 4 – Accessible and Adaptable Homes require inclusive design features including entrance level living spaces. Accessible bathrooms and provisions in relation to stair design, lift installation in apartment blocks of two or more storeys. The policy also requires wheelchair accessible standards in 10% of dwellings in the development of 20 or more units. The policy is supported by the Department and takes account of the SPPS which promotes inclusive design and age friendly environments (SPPS p 15) and good design and balanced communities that are accessible to all (SPPS, p70).
12. The Department notes that the policy explicitly does not adopt in full all lifetime

home standards and the reason for this is set out in the J&A. It is noted that, unlike some other plan strategy documents adopted to date, the policy omits external access considerations like parking accessibility and wider parking bays, which may be important for wheelchair users and those with mobility impairments. The Council may wish to consider this matter and satisfy itself that the cross reference to GP1 and the footnote to Building Regulations technical booklet R and DfC Wheelchair Housing standards address this aspect.

## **HOU 6 – Residential Extensions and Alterations**

13. The approach takes account of the SPPS objective for quality in residential development, including proposals for residential extensions and alterations (p 70). It also largely reflects the policy wording from retained planning policy EXT 1 of PPS 7 Addendum 'Residential Extensions and Alterations'. The Department notes the extensive J&A text which accompanies the policy and addresses issues such as sustainable design, people with disabilities, ancillary accommodation, rural design and the historical and natural environment. This broadly reflects the J&A text from the PPS 7 Addendum Policy EXT1. It is notable that, in common with that addendum, these issues are not explicitly referenced in the HOU 6 policy box. They therefore provide advice and best practice rather than J&A to the operational policy in HOU 6.
14. In view of this, and to improve readability and reduce the length and complexity of the LDP, the Council should consider relocating this detailed text (particularly as it functions as additional guidance/best practice rather than direct J&A to the HOU 6 policy) to a separate Supplementary Planning Guidance (SPG) document or an expanded Annex D.

## **HOU 7 – Protected Housing Areas in Town Centres**

15. HOU 7 'Protected Housing Areas' in Town Centres provides protection against loss of housing in designated town centre locations identified as LPP stage. The Department welcomes this approach which supports the housing in settlements policy approach of the SPPS to support an urban renaissance requiring LDPs to identify areas within existing town centres where existing residential development will be protected (SPPS, p74).

16. In the context of the Executive's Housing Supply Strategy, the Council is encouraged to consider the benefits of policy approaches that protect more widely against the loss of permanent housing stock to competing uses across the Council district, not just in designated town centres. This could, for example, take the form of a general presumption in favour of the retention of residential stock for permanent occupation. This would support the Council's highly ambitious job-led population and housing growth strategy by ensuring housing stock across the borough is not lost to competing uses.

### **HOU 8 – Houses of Multiple Occupation**

17. HOU 8 – Houses of Multiple Occupation (HMO) sets a 10% cap on HMOs per street/road with specific provisions related to roads in excess of 600 metres in length. The policy also includes six specific criteria relating to space standards, external areas, amenity, parking, landscaping and conversion of shops that HMO properties must meet. The Department welcomes the approach which takes account of the SPPS objective of achieving balanced communities and strengthening community cohesion (SPPS, p 70).
18. While the intent of the policy is clear and welcomed by the Department, the phrase "further HMO development" in the second paragraph of the policy creates ambiguity over whether this provision applies only where HMOs already exist on a street. The Department would recommend deletion of the word 'further'. The Council notes that the policy does not make provision for the management of the impacts of existing concentrations of HMO developments that may exceed the 10% threshold established.

### **Housing in the Countryside**

#### **HOU 10 – Replacement Dwellings**

19. In respect of Policy HOU 10 'Replacement Dwellings' the Department welcomes the policy wording which largely reflects the provisions of retained PPS 21 policy CTY 3. In the case of the replacement of non-listed vernacular dwellings, the Department welcomes the require for evidence to be submitted by a suitably qualified heritage specialist.
20. The Department notes references in the J&A at paragraph 7.127 to CLEUD.

This is a legal mechanism that confirms immunity from enforcement after a specified period. The Department is concerned, however, that the reference creates a significant risk of unintended consequences and may encourage unauthorised rebuilding and concealment to secure CLEUD status for a replacement dwelling. Linking CLEUD to eligibility for replacement may create a perception that time-based immunity can be a way of circumventing the physical tests of the policy in order to obtain a replacement even when unauthorised rebuilding works have been undertaken to contrive a 'substantially intact' building. The Council should consider removing the references to a CLEUD entirely or alternatively including additional wording to clarify that a CLEUD in respect of unauthorised building works carried out to contrive the appearance of a 'substantially intact building' will not confer eligibility for replacement under this policy. This would help to ensure that the replacement policy supports the renewal of qualifying structures and does not incentivise or reward unauthorised works.

#### **HOU 11 – Conversion and Reuse of Existing Buildings**

21. The Department welcomes the approach to HOU 11 Conversion and Reuse of Existing Buildings which takes account of the SPPS and broadly reflects the provisions of retained PPS policy CTY4. In this context we welcome the local tailoring in paragraph 7.138 of the J&A that applicants will also be required to demonstrate that the subject building is capable of conversion through a structural survey conducted by a suitably qualified professional to avoid inadvertent loss of irreparable damage to such locally important buildings.
22. The Department notes the absence of any criteria in relation services, road safety and traffic flow and the Council should be satisfied that the reference to GP1 and the other policy provisions provides sufficient policy cover in this regard. The Council is reminded that SPPS is a material consideration and require proposals for the conversion of locally important buildings to more than one dwelling to involve minimal intervention and that the intensity of the use is considered appropriate to the locality.

#### **Open Space**

23. The Department welcomes the alignment of the Council's Open Space policies

OS 1,2,3,6, & 7 which mirror the regional and strategic policy position.

#### **OS 4 – Greenways, Blueways and Community Greenways**

24. Policy OS 4 which sets out the requirements for proposals for new development within or adjacent to an existing or planned greenway, blueway or community greenway in line with paragraph 6.196 of the SPPS. The policy states that planning permission will only be granted for new development where it will not prejudice “further development as a green corridor and active travel route”. The Department recommends an amendment to this line to refer to “green/blue corridor” to ensure consistency with the title and objective of the policy which also applies to blueways. The Department welcomes the policy justification and amplification which reflects the local context.

#### **OS 5 – Outdoor Recreation in the Countryside**

25. Paragraph 6.212 of the SPPS recommends that LDPs should contain policy for the consideration of development proposals for outdoor recreation in the countryside having regard to a range of issues including visual and residential amenity; public safety, including road safety; any impact on nature conservation, landscape character, archaeology or built heritage; and accessibility. Policy OS 5 does not adhere to this requirement in the strictest form. It does not explicitly refer to public safety or road safety or have regard to impacts of proposals for outdoor recreation on nature conservation, archaeology or accessibility.
26. The Council does however state that all proposals must also comply with the General Principles Policy GP 1 and all other relevant policy provisions of the LDP including those for the coast, the protection and enhancement of natural and historic environments, active and sustainable travel, transportation, and countryside policies. This is less than ideal. Whilst some of the issues mentioned in paragraph 6.212 of the SPPS are covered by the Council in the General (GP 1) and other associated policies, application of these may be convoluted and not straightforward.
27. In addition, it is noted that paragraph 8.60 of the J&A discusses locations of landscape, nature conservation and heritage importance and paragraph 8.63 examines landscape character and habitats and nature conservation not

referred to in the policy text. The Council is reminded of the role of policy justification and amplification which should be secondary to, and an explanation of the detail already contained within planning policy. Greater prescription would strengthen policy OS 5 facilitating alignment with paragraph 6.212 of the SPPS and would make policy OS 5 easier to apply.

### **OS 8 – Development of Facilities Ancillary to Water Sports**

28. The SPPS makes clear that planning authorities should carefully consider development proposals for all sport facilities ancillary to watersports. Relevant planning considerations will include location, design, hours of operation, noise, impact upon visual and residential amenity, access and links to public transport; floodlighting; landscaping, public safety (including road safety); nature conservation, biodiversity, archaeology or built heritage. Like policy OS 5, policy OS 8 examines many of these issues that councils are required to consider under paragraph 6.213 of the SPPS within the J&A without linkage to the policy wording. This includes issues such as impact on amenity, noise and disturbance etc. While it is noted that all proposals must comply with the General Principles Policy GP 1 and all other provisions of the LDP in particular those for the protection, enhancement of the natural, marine and historic environments, policy OS 8 would be strengthened with added prescription which would also assist with policy application.

### **OS 9 – Floodlighting of Sports and Outdoor Recreational Facilities**

29. Paragraph 6.213 of the SPPS directs planning authorities to carefully consider development proposals for all sport activities and relevant planning considerations include location, design, hours of operation, noise, impact upon visual and residential amenity, access and links to public transport; floodlighting; landscaping, public safety (including road safety); nature conservation, biodiversity, archaeology or built heritage. Policy OS 9, in conjunction with policy GP 1 addresses most of these considerations, and prospective applicants are also required to comply with all other relevant policy provisions of the LDP in particular those relating to the protection and enhancement of the natural and historic environment. Whilst archaeology is not explicitly mentioned in either policy OS 9 or OS 1, the Department accepts that this could fall under criterion (a) ii and historic environment interests. The Department welcomes the requirement

to consider the impact of proposals for floodlighting on the marine environment given the Borough's extensive coastline.

### **General comment – Open Space**

30. It is noted that some but not all of the open space policies require compliance with the General Principles Policy GDP 1 and all other relevant provisions of the LDP. For coherency, the Council may wish to repeat the requirement to comply with Policy GP 1 in all open space policies. Health, Education, Community and Cultural Facilities

### **HECC 1 – Protection of Land for Health, Education, Community and Cultural Uses**

31. Policy HECC 1 seeks to protect land for health, education, community and cultural uses. It recognises that exceptionally, consideration may be given to alternative proposals if it can be demonstrated to the Council's satisfaction that the original site is no longer necessary and that the site is not viable for an alternative community use. The Council may wish to indicate the extent of information that it is likely to require or consider further guidance on the matter in the forthcoming supplementary planning guidance to assist policy application and implementation. Rather than elaborating upon the information that may be required to be considered, the accompanying J&A says that it will be necessary to demonstrate that the site is no longer required by the service provider. This could be seen to be a low policy bar for prospective applicants to overcome.

### **HECC 2 – Health, Education, Community and Cultural Facilities**

32. The SPPS, paragraph 6.253 requires councils to allocate sufficient land to meet the anticipated needs of the community, in terms of health, education and other public services. Policy HECC 2 recognises that the LDP must be flexible enough to accommodate facilities where there is a need that cannot be accommodated on an existing site. The Department welcomes the Council's sequential approach whereby settlements will be the preferred location for facilities and exceptionally, to meet a need in a rural community, new proposals will be directed to edge of settlement locations in the first instance and should seek to re-use existing buildings where possible. This is in line with the wider sustainability objectives of the SPPS and will promote more sustainable patterns

of development. The Department also welcomes the signposting to the relevant countryside policies.

33. It is noted that paragraph 9.12 refers to a “new community use or facility”. The Department recommends that the Council amends this to refer to “a new health, education, community or cultural use or facility” to avoid confusion and to ensure consistency with the wording of the previous policy HECC 1 and alignment with the title of policy HECC 2.

## **Economic Development**

34. The Department acknowledges the Council’s policies ED 3,7,9 and 10 and are to be considered to be reflective of regional policy.

## **Economic Development in Settlements**

### **ED 1 – Principal Settlements – Sites Zoned as Strategic Employment Locations**

35. The SEL policy is reflective of the regional position. The presumption against class B1 is welcomed as it is the SPPS’s (6.85) intention that office development be located within city and town centres and in other locations that may be specified for such use in a LDP, such as a district or local centre.. The restrictions on retailing highlighted in the J&A and contained in the policy are welcomed in order to provide protection for economic development from further encroachment by retail development that should be directed to the appropriate centre.

### **ED 2 – Principal Settlements – Other Zoned Sites**

36. The SPPS at 6.85 states, “Proposals for Class B1 business uses (such as offices and call centres) should be permitted if located within city or town centres, and in other locations that may be specified for such use in a LDP, such as a district or local centre. Elsewhere, such proposals should be determined on their individual merits, taking account of the potential impacts and the likely economic benefits, both local and regional”. This policy excludes B1(a) which is welcomed.
37. There does not appear to be a reference to office development being ideally located in town or city centres as is contained in SPPS and in the extant regional

policy provision in PPS 4 PED 1.

38. The policy does reflect the desire to protect economic land supply, but with limited flexibility (allowed for in SPPS at 6.89) to consider alternative proposals that offer community, environmental or other benefits, that are considered to outweigh the loss of land for economic development use.

## **Economic Development in the Countryside**

### **ED 4 – Major Economic Development in the Countryside**

39. The Department notes this policy restricts B2 and B3 uses with qualifying criteria that reflect regional policy and the edge of settlement preference. The use of terminology should reflect the SPPS where outside of settlements is used.
40. Clarification that relocation of extant urban based enterprises to the countryside will not normally be permitted is welcomed.

### **ED 5 – Expansion of an Established Economic Development Use in the Countryside**

41. This broadly follows retained policy PED 3 with the first bullet point differences reflecting SPPS Paragraph 6.88 second bullet point where a proposal for major or regionally significant economic development needs to demonstrate a significant contribution to the regional economy. Of note the terms, 'operational or site-specific requirements' are used in criteria (a) however 'particular operational or employment reasons' is used in the explanation of the policy. The Council will need to adopt a consistent approach in terminology.

### **ED 6 – Redevelopment of an Established Economic Development Use in the Countryside**

42. The Department notes policy ED 6 replicates the majority of the provisions of PPS4 PED 4, except for reference to social and affordable housing provision. Council may wish to clarify the rationale for the omission.

### **ED 8 – Agricultural and Forestry Development**

43. The policy is reflective of regional policy requirements. In addition, the

Department welcomes the issue of ammonia emissions being highlighted.

## **Town Centres and Retailing**

### **RET 1 – Retailing and Main Town Centres Uses**

44. The direction of the policy which reflects the town centre first approach contained in the SPPS is welcomed. The opening line of the policy could perhaps emphasise this intention, such as stating, “in line with the regional position for a town centre first approach”.
45. The policy requires an assessment of need incorporating a quantitative and qualitative assessment taking account of the needs of the local town, committed development proposals, and allocated sites. The J&A whilst explaining the sequential approach does not elaborate upon what information an applicant is expected to submit. This may be addressed in SPG, however it is not something that can be left to wide interpretation in order to maintain the consistent application and interpretation of the policy.

### **RET 2 – District Centres**

46. The policy approach of retention and consolidation of existing district centres’ provision rather than competition with the town centre is reflective of the SPPS intention (Para 6.283) is welcomed. The Council highlights (para 11.2) that Bloomfield ‘District Centre’ is the second comparison retail destination within the borough, therefore the Department welcomes the Council alignment with regional policy provision to retain and consolidate districts centres.
47. The Department welcomes bullet point four regarding assessment of vitality and viability for proposals for retail and other main town centre uses that could impact adversely on the town centres within the catchment.. It is necessary to explain how this impact will be assessed and it should also be considered that the impact may not only be on town centres but other district and local centres may potentially be affected by trade draw to the new proposed development. The Council may wish to consider this in any forthcoming Retail SPG.

### **RET 3 – Local Centres**

48. The policy is welcomed however for clarity and to assist policy implementation it

would be helpful if the Council set out the information required to demonstrate the policy test for 'local need'. The Council may wish to consider this in any forthcoming Retail SPG.

#### **RET 4 – Villages and Small Settlements**

49. The requirement for a need assessment is welcomed. The Council may wish to consider if further explanation is required through SPG.

#### **RET 5 – Retailing in the Countryside**

50. The policy is reflective of SPPS Para 6.286.
51. The inclusion of 'where possible' in the second bullet point could dilute the intention of the policy objective to ensure the reuse of redundant buildings. The clarification at the end of the policy where by exception a new structure may be permitted is considered sufficient and more robust in ensuring diversification projects minimise new construction and are more sustainable.

#### **RET 6 – Out of Centre Development**

52. The policy is welcomed and allows scope for officers of the Council to require retail impact assessments in circumstances below the 1000sqm threshold put forward here. The Council will however need to have an idea of what the significantly adverse trade draw or diversion could be within the catchment, especially in the context of Bangor large town centre s current retail offering. This may necessitate further studies above that undertaken for the plan to give officers of the Council a data source for their area.

#### **Sustainable Tourism**

53. The Department welcomes the alignment of the Council's Tourism policies TSM 1, 3 & 5 which mirror the regional and strategic policy position.

#### **TSM 2 – Tourist Amenities in the Countryside**

54. The regional approach to tourism in the countryside is set out in paragraphs 6.267 and 6.268 of the SPPS. Policy TSM 2 facilitates appropriate tourism development in the countryside in line with this regional and strategic policy

direction. It is noted that regionally important tourist amenity proposals, or those that are significant in terms of extent or scale, must be supported by evidence which demonstrates these benefits. The Council may wish to signpost to Annex H and the information to be included within a Tourism Benefit Statement to assist with policy application and implementation.

#### **TSM 4 – Major Tourism Development in the Countryside – Exceptional Circumstances**

55. Proposals for major tourism development in the countryside will be permitted where they demonstrate exceptional benefit to the tourism industry and whereby a countryside location is required by virtue of its size or for site specific or functional reasons, as well as provide sustainable benefit to the locality. The addition of a separate criterion requiring the demonstration of accessibility of tourism development to active travel networks and public transport is welcomed. It is noted however, that sufficient evidence will be required to demonstrate how realistic a proposal may be. What is deemed to be sufficient to one person may not be to another. Therefore, the Council may wish to provide further information on what it is likely to deem acceptable in this regard. Notwithstanding, the Department is content that the policy takes account of the strategic direction set out in paragraph 6.268 and paragraph 6.272 of the SPPS.

#### **TSM 6 – New and Extended Holiday Parks and Glamping Accommodation**

56. Policy TSM 6 sets out the requirements for proposals for new and extended holiday parks within sensitive areas and glamping accommodation within priority and sensitive areas as defined in the Tourism Hierarchy in Table 9. It is noted that criterion (h) requires information on the construction of each form of accommodation to accompany each proposal. The Council may wish to indicate the extent of information that it requires to be submitted in this regard.
57. While the Department welcomes the provisions for glamping accommodation included as part of TSM 6, these apply to three or more glamping accommodation units only. It is therefore unclear how proposals for two or less glamping units would be assessed under the current suite of tourism policies. The Council may wish to remove one of the statements that “supporting evidence for any proposal should be proportionate to the size of the scheme.”

which appears twice under Glamping Accommodation. It is also unclear if a sustainable benefit statement will be required as part of the aforementioned supporting evidence in line with the other tourism policies and the wider principles of sustainable tourism advocated by the SPPS. The Council may also wish to clarify that glamping accommodation proposals which incorporate serviced units that can be defined as self-contained with serviced connections will be assessed under Policy TSM 5 Self-Catering Accommodation in the Countryside.

### **TSM 7 – Safeguarding of Tourism Assets**

58. The Department welcomes the definition of a tourism asset which is consistent with the definition contained within paragraph 6.269 of the SPPS. The Department however notes an error in the second line of paragraph 12.63 which refers to “adverse on” instead of “adverse impact on”. This should be amended accordingly.

### **General comments - Sustainable Tourism**

59. It is noted that the Council’s Tourism Technical Supplement 7 is silent on the issue of Short Term Let accommodation and that there is no policy provision to deal with this emerging category of accommodation within the Sustainable Tourism chapter. It would be helpful to know how the Council intends to deal with proposals for Short Term Let accommodation in the Borough over the Plan Period.

### **Mineral Development**

60. The Department welcomes the general alignment of the Council’s Mineral Development Strategy and policies MIN 1, 4, 5, 7,8 & 9 reflecting the regional policy provision. The Department would offer the following comments to Policies MIN 2, 3 & 6.

### **MIN 2 – Areas of Constraint on Mineral Developments (ACMDs)**

61. This policy provides two exceptions whereby permission will be granted in ACMDs; where the proposed operations are short term; and where the environmental and/or amenity impacts are not significant. This is in line with SPPS para 6.164.

62. However, additionally, within the J&A, the Council state “Exceptionally mineral development within an ACMD will be permitted where it is demonstrated that the development would not unduly compromise the integrity of the ACMD or threaten to undermine the rationale for the designation.” This text sits in the SPPS within para 6.155 bullet 3. To ensure alignment with the SPPS and for clarity, the Council should fully reflect the SPPS to avoid confusion, by advising that within an ACMD, where a designated area such as an Area of Outstanding Natural Beauty (AONB) covers expansive tracts of land, the Council will consider the scope for some minerals development that avoids key sites and that would not unduly compromise the integrity of the area as a whole or threaten to undermine the rationale for the designation.
63. Policy para 2 is in line with SPPS para 6.164.
64. The Department notes the Council’s position regarding the designation of ACMDs. The Minerals Technical Supplement advises that “Whilst extant plans contain designated Areas of Constraint for Mineral Development, the LDP will define these areas at LPP stage and will not be retaining the designations contained within ADAP and dBMAP at this time.” The council goes on to advise that “A comprehensive review of the boundary of the ACMD across the Council area will be defined at LPP stage. A Review of Landscape Character Areas has been undertaken to update existing reviews to inform the Draft Plan Strategy (DPS) (Document Reference 9A).
65. Further analysis, guidance from both DfI Planning, DfE GSNI and research may be required at Local Policies Plan (LPP) stage to define the appropriate extent of an Area of Constraint for Mineral Development (ACMD).”

### **MIN 3 – Valuable Minerals**

66. The policy and its J&A contains some inconsistent wording with respect to the consideration of proposals within designated areas. The policy contains the phrase; “due weight will be given to the reason for the designation and all applications for valuable minerals will have to comply with MIN 1 Environmental Impact”; while the J&A contains the following phrase; “due weight will be given to the reasoning for the designation, and what it seeks to protect.”; and “due weight will be given to the reason for the statutory zoning.”

67. While this represents unnecessary repetition, for the avoidance of doubt, the Council should consider using consistent wording. The policy itself should make clear, in line with paragraph 6.157 in the SPPS, that there will not be a presumption against the exploitation of valuable minerals in any area, however in considering a proposal where the site is within a statutory policy area, due weight will be given to the reason for the statutory zoning.

#### **MIN 6 – Traffic**

68. In relation to traffic from a mineral's development proposal, the SPPS, at paragraph 6.160, states that "planning permission will normally be refused unless the access road and / or local road network can be satisfactorily improved". The Council should include this additional underlined text regarding the local road network to ensure their policy reflects strategic policy.

#### **Natural Environment**

69. The Department welcomes the general alignment of the Council's Natural Environment Strategy and policies NE 2, 3, 5, & 6 reflecting the regional policy provision. Please also refer to the comments provided by DAERA Natural Environment Division. The Department would offer the following comments to Policies NE1 & 4.

#### **NE 1 - International and European Designations**

70. Generally, this policy aligns with the SPPS, however, in relation to planning permission in a European Site, or a listed or proposed Ramsar site, the Department notes that the initial paragraph of this policy departs from the SPPS para 6.176 and PPS 2, from "is not likely to have a significant effect on", to "is not likely to have an adverse effecton".
71. Additionally, with reference to the 2<sup>nd</sup> paragraph of the policy, the paragraph 6.177 in the SPPS which states that "Where a development proposal is likely to have a significant effect (either alone or in combination) or reasonable scientific doubt remains, the planning authority is required by law to carry out an appropriate assessment of the implications for the site in view of the site's conservation objectives." The Council should include, in line with paragraph

72. 6.177 in the SPPS, text to specify that “Only after having ascertained that it will not adversely affect the integrity of the site, can the planning authority agree to the development and impose appropriate mitigation measures in the form of planning conditions”.

#### **NE 4 - Sites of Nature Conservation Importance - Local Designations**

73. The Department notes that this policy aligns broadly with paragraph 6.190 in the SPPS. However, for clarity and in order to fully reflect the SPPS, the Council should consider amending “a significant impact” to “significant adverse impact” because the policy, as written, may now imply positive impacts might preclude an application from progressing. Also, in line with para 6.190 in the SPPS, the Council should amend “may only be permitted” to “should only be permitted”.

#### **Historic Environment**

74. The Department welcomes the alignment of the Council’s Historic Environment Strategy, Designation NM 1- Nendrum Area of Significant Archaeological Interest, Policies HE2-HE14 and Maps 7&8 reflecting the regional policy provision. Please also refer to the comments provided by DfC Historic Environment Division. The Department would offer the following comments to Policy HE 1- Statements of Significance and Annex I as well as the Glossary, Part F.

#### **HE1 – Statement of Significance**

75. Policy HE 1 introduces a requirement for all development proposals impacting upon a list of five heritage assets to include a Statement of Significance (SoS) and Annex I provides information on SoS. The SPPS states that Planning Authorities should seek all necessary information from applicants in making well informed planning judgements, particularly regarding impact of a development proposal (SPPS paragraphs 6.10, 6.12 6.17, 6.18, 6.29). However, the introduction of a SoS for ALL development proposals on these heritage assets could be overly onerous and developments should be assessed or evaluated in the first instance, for deciding if a SoS is required. Instead it might be best to have information on SoS in the introductory text to say that SoS may be required in some cases following an assessment/evaluation which will be indicated in the

relevant HE policies (e.g similar to HE 4) and that the Council will engage with DfC HED via consultation who are the competent regional authority, who will decide if a SoS is required. Should the Council wish to consider this change, the Council should engage with DfC HED regarding appropriate wording for the introductory text or policy change.

76. Also, given this onerous policy, thought should also be given to Annex I which conflicts with published regional guidance by DfC HED,. The Council may wish to consider signposting to the DfC HED website and published guidance within their introductory chapter or J&A, which will ensure any updates to the guidance will be current via the website.

## **Coastal Management**

77. The Department welcomes the alignment of the Council's Coastal Strategy, Designation UCZ-1 Ards and North Down Undeveloped Coastal Zone and Policy CO 2– Urban Waterfronts in the Developed Coast, reflecting the current regional policy provision. The Department would offer the following comments to Policies CO 1- The Undeveloped Coast and Policy CO 3- Coastal Change.

### **CO 1 – The Undeveloped Coast**

78. In paragraph 6.38 in the SPPS , it states that development should only be permitted on the undeveloped coast where the proposal is of such “such national or regional importance as to outweigh any potential detrimental impact on the coastal environment.” The Department would suggest inclusion of this further wording, to align with SPPS and ensure the policy intention is realised and aligns with their coastal strategy and their designation.
79. Regarding Criteria (d) of the policy, the paragraph 6.38 in the SPPS uses the term “potential detrimental impact” rather than “unacceptable impact” on the coastal environment. The Council should ensure by not changing this terminology that this policy covers potential detrimental impact in line with regional policy.
80. The SPPS offers little exception to policy where the undeveloped coast is concerned, however Policy CO1 has provided five exceptions that do not need to comply with criteria ‘a’, ‘b’ and ‘c’ of the policy but must comply with ‘d’.

81. The second bullet of the list of exceptions refers to water-based recreation. Paragraph 6.44 in the SPPS states that “some developments require a coastal location eg ports, marinas, port-related industries and recreational projects. Where appropriate, LDPs should identify land to be zoned for such uses within settlements. The inclusion of this second bullet point on water- based recreation, reduces the protection offered to the undeveloped coastline provided within the SPPS paragraph 6.44 for water-based attractions and has the potential to impact the UDZ designation, which was designated to provide protection. Paragraph 1.5 of the Council’s technical report says ‘*Our coastline is under pressure from various types of development including residential schemes, coastal industry and recreation. At the same time, the natural processes of shoreline change including erosion and land instability present further challenges for existing and proposed coastal developments.*’
82. The Department is concerned that Criteria (d) does not provide enough protection against recreational development in the UDZ, and that it is contrary to Paragraph 6.44 in the SPPS . Furthermore, it is unclear how an applicant should demonstrate the impact or accumulation of any of the five exceptions in the UDZ, when applying criteria (d). The Technical Report para 7.19 says the ‘*onus should be upon the developer to provide evidence of potential impacts and mitigation measures*’.
83. J&A to Policy CO 1 should make clear the policy intention and provide a clear understanding of what evidence is required of the applicant e.g. an assessment or report.
84. It is noted that water-based recreation is also listed at criteria (e) of Policy CO2 Developed Coast, which is welcomed. The Department also welcomes the inclusion of Map 1d which shows the extent of the undeveloped coastline.
85. The fourth bullet point of Policy CO 1 criteria (d) says ‘*Householder development e.g. residential extensions, alterations, sheds and garages, within the curtilage of the existing dwelling;*’ the Department also notes the content of J&A paragraph 16.18. The Council should ensure that if it is their intention that any extension and/or alteration does not ‘*have a significant adverse impact upon the coast due to their modest scale*’ that it provides clarity on those residential extensions and alterations that fall beyond ‘permitted development’.

86. For consistency and clarity, the Council should consider adding a line to bullet 4 to curtail the size of minor development that is acceptable and modest in scale, akin to Policy FLD 1 Development in Fluvial (River) and Coastal Flood Plains; otherwise HOU 6 will be the policy that is applicable.

### **CO 3 - Coastal Change**

87. The second paragraph of Policy CO 3 says: *'In areas of known land instability and coastal erosion, new development or the intensification of existing development or land uses will not be permitted'*. The SPPS paragraph 6.42 states that "Development will not be permitted in areas of the coast known to be a risk from flooding, coastal erosion or land instability". The Council should consider inclusion of 'flooding' into this paragraph to align with regional policy.
88. The third paragraph of Policy CO3 says: *'An exception may be permitted for householder development (the alteration extension or improvement of a dwelling house or minor development within its curtilage such as garages, walls and other outbuildings) where the proposed development does not extend closer to the coastline than the existing dwelling house'*. The Council's Flooding policy FLD 1 allows for minor development, and it has a footnote to say, *'For the purposes of this policy, "minor development" refers to extension, alterations and ancillary buildings within the curtilage of an existing dwelling and non-residential extensions with a floor area less than 150m<sup>2</sup> (measured externally)'*. The Council should consider a signpost for clarity, to FLD1, in the 3<sup>rd</sup> paragraph when discussing minor development.

### **Flooding and Drainage**

89. The Department welcomes the alignment of the Council's Flood Risk and Drainage Strategy and Policies FLD 1-FLD 6, reflecting the regional policy provision. Please also refer to the comments provided by Dfl Rivers and Sustainable Drainage Directorate.

### **Outdoor Advertisements**

90. The Department welcomes the alignment of the Council's Outdoor Advertisements Strategy and Policy AD1, reflecting the regional policy provision.

## **Hazardous Substances, Control of Major Accident Hazards CMA 1 – Control of Major Accident Hazards**

91. Policy CMA 1 Control of Major Accident Hazards (COMAH) is welcomed as it provides a policy footing to restrict development in the vicinity of such a site after consultation with the Health and Safety Executive for Northern Ireland.

## **CU 1 - Contaminated and Unstable Land**

92. The Department welcomes the contaminated and unstable land policy CU 1 reflecting the regional policy provision.
93. The scene setting is informative outlining that the Contaminated Land Regime, which is set out in Part III of the Waste and Contaminated Land (Northern Ireland) Order 1997 has been enacted, but is not yet in force. There is therefore not a list of sites subject to contamination within the borough in advance of the regime being enacted.
94. The policy highlights the requirement to submit a primary risk assessment (PRA) for contamination assessment and also highlights mine risk assessment for unstable land which is an issue in part of the borough related to old mine workings. This approach is welcomed.

## **Infrastructure**

### **Renewable Energy**

95. The Department welcomes the Council's Renewable Energy Strategy and the Council's consideration of the SPPS Edition 2, as set out in Table 1 published on the Council's website. As previously mentioned in paragraph 88 of our strategic response, the Department notes that the Council will consider any changes through the plan-making process further to the completion of public consultation.

### **Policy RE 1 – Renewable and Low/Zero Carbon Energy Development**

96. The Department's comments are based on review of the dPS against the SPPS (Edition 2) which was published on 11<sup>th</sup> December 2025, and the Department's letter dated the 21<sup>st</sup> October 2025 in relation to updated regional policy.

97. The Department notes the contents of Policy RE 1 and offers the following comments. The SPPS Edition 2 introduces changes in the regional policy direction for renewable and low-carbon energy. The Council should consider the revised aim emphasises “maximising” sustainable development in appropriate locations, and this aim should be interpreted in the context of the policy and SPPS overall. The Council should be seeking to achieve the optimal outcome for enabling appropriate renewable and low carbon energy development in appropriate locations whilst balancing environmental and community considerations. The revised SPPS recognises the wider contemporary context for renewable energy and the implementation of the policy requires balanced decision taking.
98. The Council’s dPS Policy RE 1 is not explicit about the various types of energy sources as detailed in the SPPS and does not include anything for solar, hydro, geothermal, biomass/AD, energy-from-waste (qualifying as renewable), BESS, synchronous compensators, co-located systems, and onshore infrastructure supporting offshore renewables in policy. Information on some of these technologies is contained within the dPS J&A paragraphs 21.27-21.35, and therefore the Council should consider these sources under the policy section. The Council’s dPS J&A paragraphs 21.31-21.35 also refers to mitigation and what applicants should do; the Department recommends that this should also be considered in policy. The section on emerging technologies within the J&A paragraphs 21.42-21.43, should also be considered in policy which would align with SPPS Edition 2 (paragraph 6.218).
99. The Department notes the Council’s policy on wind energy. As updated in the SPPS Edition 2, separation distances for wind energy development will be assessed on a case-by-case basis. A minimum separation of 500m from occupied property will generally apply for wind farm development. Therefore, the Council should consider their policy wording which additionally relates to the 10 times rotor diameter to occupied property. This is a change in regional policy approach now set out in the SPPS Edition 2 para 6.227.
100. The Council should consider locational and technology specific criteria and consider sensitivity mapping (including Figure 12) which could guide assessment. (SPPS Edition 2 para 6.222). Onshore development should also be considered, which is required to support offshore energy (substations, cabling, landfall infrastructure) and policy should ensure careful coastal siting (SPPS Edition 2 para 6.240). Therefore,

policy should be supported and consistent with coastal policies, the Coastal Management Strategy, and potentially Policy FLD1 (SPPS Edition 2 para 6.220 (bullet 6) & para 6.240).

101. The Department notes the absence to any policy reference on co-location, and therefore the Council should consider policy direction/support for co-location, as per the SPPS, paragraph 6.231. Therefore, early engagement with NIE Networks is encouraged. Undergrounding of new powerlines is preferred where feasible and appropriate and infrastructure will be assessed with Policy EI1. Proposals must also demonstrate how redundant plant and infrastructure will be removed and the site restored and restoration should be secured by conditions or legal agreement.
102. The Council should also include policy direction which demonstrates early community and stakeholder engagement and evidence how site selection, siting, scale and design avoid or minimise impacts. (SPPS Edition 2 para 6.241). The policy would also benefit from inclusion of cross reference to any other relevant policies such as, GP1, EI1, PA1, CC1 and all relevant environmental protections, and ensure they all remain up to date and have taken account of new strategic planning policy.

### **Policy RE2 - Reduced Energy Consumption and Use of Low/Zero-Carbon Energy**

103. The Department notes the contents of Policy RE 2 and offers the following comments. The Council should consider the SPPS Edition 2 requirements to integrate microgeneration and passive solar design (SPPS Edition 2 para 6.222), robust information requirements for renewable and low-carbon development (SPPS Edition 2 para 6.236–6.240). Consideration should also be given to energy demand; carbon reduction; decentralised systems; district heating feasibility and grid capacity issues. Guidance on grid connection requires early engagement with NIE and consideration of undergrounding (SPPS Edition 2 para 6.238). Councils should consider including policy reference to orientation, massing, glazing ratios, shading, and natural ventilation with regard to passive solar design (SPPS Edition 2 para 6.220(5) & para 6.222).
104. The Department welcomes the alignment of the Council's Transportation policies TRAN 1, 2, 4, 5, 8 & 9 which mirror the regional and strategic policy position.

## **Transportation**

### **AT 1 – Supporting Active Travel and Sustainable Transport**

105. The Department welcomes Policy AT 1 which requires prospective applicants to demonstrate how the promotion of active travel and sustainable transport has been maximised in all new development proposals. The policy takes into account the needs of pedestrians, cyclists and other wheeled users but does not acknowledge the needs of those with mobility impairments or disabilities. The Council may wish to amend policy AT 1 accordingly in order to be consistent with paragraph 6.304 of the SPPS which requires accessibility for all with the needs of people with disabilities and others whose mobility is impaired to be given particular consideration; and paragraph 6.309 of the SPPS, which requires proposed development to accommodate for the particular needs of people with disabilities.
106. In addition, it is noted that prospective applicants will be required to consider complementary measures that support a reduction in private car usage. The Council may wish to indicate the type of complementary measures that it has in mind or to direct the reader to supplementary planning guidance to assist policy application and implementation. Consideration should also be given as to how such complementary measures could be enforced.

### **TRAN 1 – Creating an Accessible Environment**

107. It is noted that the policy is set out in bullet points. The Council may wish to replace bullet points with lettering or numbering to be consistent with the other transportation policies and to aid policy implementation.

### **TRAN 3 – Access to Protected Routes**

108. It would be helpful for the Council to include a footnote with a hyperlink to the DfI Protected Routes Map as part of this policy or within the associated J&A. This map is updated by DfI as and when new roads are constructed and its inclusion would assist prospective applicants, and those applying policy TRAN 3, facilitating flexibility to deal with changing circumstances over the plan period.

### **TRAN 4 – Protection for New Transport Schemes**

109. Policy TRAN 4 refers to the 'Transport Plan'. It would be helpful to make clear that this is the 'Local Transport Plan' for clarity purposes and to be consistent with the reference contained within policy TRAN 5.

### **TRAN 6 – Transport Assessment**

110. Policy TRAN 6 states that a Transport Assessment is required to review the transport impacts of applications for “significant travel generating uses”. The Department recommends that “significant travel generating uses” is amended to clarify that this includes travel by multiple sources including vehicles, wheel users and pedestrians. It is also important to make clear that there may be other instances which warrant the submission of a Transport Assessment including for proposals that give rise to concerns over road safety. To be consistent with previous policies, the Council may also wish to include a footnote and hyperlink to the document referred to in paragraph 22.52 of the J&A.

### **TRAN 7 – Parking and Servicing Arrangements**

111. Policy TRAN 7 sets out the provisions for parking and servicing arrangements. The Department welcomes the Council’s clarification that “parking” includes car, coach and cycle parking. It is noted that proposals involving car parking in excess of published standards, or which exceed a reduction provided for in the LDP will rarely be acceptable. This is in line with paragraph 6.308 of the SPPS which recognises the role of car parking in influencing modal choice between private car and public transport.
112. In order to be consistent with previous policies, the Council may wish to provide a hyperlink to the documents referred to in footnotes 23 and 24. In addition, it is important to recognise that while Travel Plans, through the setting out of complementary measures can help to mitigate adverse impacts highlighted by Transport Assessments, it is vital that the Council makes appropriate provision for the monitoring and enforcement of these Travel Plans, particularly in instances where agreed objectives are not met. Doing so will secure the overall delivery of more sustainable travel patterns in the borough reducing the level of private car generated traffic as advocated by paragraph 6.310 of the SPPS.
113. The Council acknowledges that prospective applicants will be required to reserve

an appropriate proportion of parking spaces to meet the needs of people with disabilities. A different emphasis, however, is placed on prospective applicants in relation to 'parent and child' parking spaces whereby consideration should be given to the provision of these spaces. This suggests that applicants could potentially consider parent and child parking spaces and then possibly discount them. It is recommended that the Council amends policy TRAN 7 to require the provision of 'parent and child' parking spaces to better align with paragraph 6.308 of the SPPS.

### **Public Utilities, Infrastructure and Connectivity EI 1 – Electricity and Energy Infrastructure**

114. The Council states that it will grant planning permission for electricity or gas network infrastructure together with any enabling works where they avoid sites of landscape sensitivity. The Council may wish to amend criterion (a) to refer to "sites of landscape/townscape sensitivity" also in order to be consistent with the wording of paragraph 23.25 of the J&A and the Council's wish to enhance visual amenity in designated areas of townscape value.
115. The Department also notes that proposals for electricity network structures and overhead power lines will only be permitted whereby they are accompanied by a statement demonstrating that the proposal meets the ICIRP guides for exposure to electro-magnetic fields (EMFs) consistent with the requirements of paragraph 6.249 of the SPPS. In addition, the Council should also be aware of the requirements contained in the Code of Practice "Optimum phasing of high voltage double-circuit power lines (published by the UK Government, the Energy Networks Association and devolved Administrations) and the need to employ optimum phasing as a precautionary measure, where it is reasonable in order to reduce the EMFs from overhead power lines.

### **TEL 1 – Control and Telecommunications Development**

116. The aim of the SPPS in relation to telecommunications is to facilitate the development of such infrastructure in an efficient and effective manner whilst keeping the environmental impact to a minimum. The Department welcomes alignment of Council's Policy TEL 1 with regional policy provisions.

117. The should be aware that control and switching equipment should not be located in areas prone to risk of flooding. If it is necessary to locate such equipment in flood plains, it must be made resistant to flooding and resilient so that service will not be interrupted in the event of a flood. Any proposals in flood plains will be considered under policy FLD 1.

## **Cemetery and Burial Space**

### **CEM 1 – Cemeteries and Burial Space**

118. The policy permits extensions to burial space or new cemeteries where proposals will not adversely impact the natural and historic environment and landscape including groundwater. It is noted in the associated J&A that “a Hydrological Risk Assessment which demonstrates the suitability of the proposal should take account of the following advice”. Given that ‘advice’ is an opinion or recommendation, the policy could be strengthened by removal of the word ‘advice’ requiring prospective applicants to “take account of the following”. The inclusion of hyperlinks to documents below the J&A is welcomed.

## **Waste Management**

119. Policies WM 1 to WM 5 mirror the regional policy contained PPS 11 Planning and Waste Management. Some additional emphasis is placed on restoration and impact on landscape and seascape which is welcomed.

## **Non-Mains Wastewater Infrastructure**

### **NMW 1 – Non-Mains Wastewater Infrastructure**

120. Sustainable development is at the heart of the SPPS and the planning system. The SPPS seeks to ensure the planning system contributes to a reduction in water usage and promotes the management of development to safeguard against water pollution, flooding and securing improvements in water quality.
121. The Department notes the inclusion of policy on the provision of non- mains wastewater infrastructure but would highlight that development that relies on non-mains wastewater infrastructure should not only create or add to a pollution problem but should not threaten environmental quality or character of the locality or add to a flood risk.

122. The Department would remind the Council that the method of non- mains sewage disposal must be to the satisfaction of the Council's Environmental Health Department along with the Northern Ireland Environment Agency. The Council will also be aware that NI Water does not manage non mains wastewater systems. DfI welcomes reference to the necessary consent to discharge under the Water (Northern Ireland) Order 1999 from the Department for Agriculture, Environment and Rural Affairs (DAERA). The onus is on the developer/householder to ensure such consent is or can be agreed for the development proposed. The provision of a package treatment plant is preferred to the use of a septic tank in the treatment and dispersal of non-mains sewage.
123. The Department welcomes wording of Policy NMW1 which reflects the approach of other policies in plan strategy documents adopted to date. The Department welcomes the inter-relationship shown between the LDP and the Council's Community Plan at paragraph 25.8. The Department notes the nature of the J&A and welcomes the inclusion of text on how pollution from point sources can individually or cumulatively increase pollution risk.
124. The Department welcomes reference to existing standing advice from the Department of Agriculture, Environment and Rural Affairs (DAERA) specifically in relation to non-mains sewerage developments having the potential to affect natural heritage interests or the water environment including groundwater and fisheries.

### **Monitoring and Review Monitoring Framework**

125. The Department notes and welcomes Economic Objectives 3a, 3b and 3c in the Monitoring Framework (page 480 of the Draft Plan Strategy). DfI however would highlight that reference should be made to SGS 3, *Strategic Allocation of Economic and Industrial Land* in the 1<sup>st</sup> column entitled "Indicator" as this underpins the Economic Objectives and related indicators in the draft Plan Strategy.

### **Glossary -Part F**

126. It is noted that the definition of 'open space' refers to PPS 8. The Council may wish to remove reference to PPS 8 as this shall cease to have effect once the

Plan Strategy is adopted as outlined in paragraph 1.9 of the SPPS.

127. The glossary gives the SPPS definition of an LLPA however when reviewed against Policy CS3 – LLPAs, different language is used. For consistency, this language should be similar. The terminology in the SPPS and glossary is stronger and therefore, policy should reflect this ie “protection from undesirable or damaging development” as opposed to” will not have a significant adverse impact”.

# **Strategic Response to Ards and North Down Borough Council Draft Plan Strategy**

## **Introduction**

1. The Department for Infrastructure would like to thank the Council for the opportunity to comment on the Ards and North Down Borough Council Local Development Plan (LDP) draft Plan Strategy (dPS). The LDP should provide a 15 year framework to support the economic and social needs of a Council's district taking account of planning policy and guidance.
2. The Council's LDP should support and spatially represent the Community Plan vision. Whilst the LDP and Community Plan should work in tandem toward this vision, the LDP has a distinct role in giving spatial expression to the Community Plan. It is also important to acknowledge that preparation of the LDP is subject to a different statutory process, including an Independent Examination (IE) to test soundness of the Plan as a whole. This includes examining the content of the Plan by reference to tests set out in guidance. These require Council to take account of the Regional Development Strategy (RDS) 2035 and other policy and guidance issued by the Department.
3. In view of the above, and in keeping with its oversight role, the Department offers this representation in the interest of good practice and to assist the Council to minimise the risk of submitting an unsound Development Plan Document (DPD). In developing this response the Department has looked for clear evidence that the tests set out in Development Plan Practice Note (DPPN) 06 'Soundness' have been addressed. All comments are offered without prejudice to the Minister's discretion to intervene later in the plan process or to the IE of the dPS.
4. We acknowledge the considerable amount of work that the Council development plan team has put into preparing the dPS and supporting documents. We would encourage the Council to seek legal advice to ensure that all the procedural requirements have been met, including Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA). Responsibility for these matters rests with the Council.

5. This strategic response highlights broad areas which the Department considers are relevant to the tests of soundness set out in DPPN 06. These are the Growth Strategy Infrastructure, Cross Boundary Working and Monitoring. These aspects have been highlighted by the Department in order to reinforce their importance to achieving an integrated and co-ordinated approach to higher-level regional planning aims and objectives. This response is structured around these broad themes having considered the Council's Growth Strategy, Countryside Strategy and Climate Change Adaptation and Mitigation Strategy along with a number of the strategic topic policies contained in Part D of the document. These matters are also aspects of soundness and so the relevant soundness tests are highlighted.
6. Annex 1 to this response provides comments in relation to the general and operational policies contained in Parts C and D of the document.

## **GROWTH STRATEGY**

***C1 Did the Council take account of the Regional Development Strategy?***

***C2 Did the Council take account of it's Community Plan?***

***C3 Did the Council take account of policy and guidance issued by the Department?***

***CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross-boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.***

***CE2 The strategy, policies and allocations are realistic and appropriate having considered the relative alternatives and are founded on a robust evidence base.***

***CE3 There are clear mechanisms for implementation and monitoring.***

### **SGS 1 – Spatial Growth Strategy**

7. The overall growth strategy is set out under SGS 1 Spatial Growth Strategy (page 59 of the dPS) and is helpfully illustrated on Map 2 Spatial Growth Strategy including Settlement Hierarchy. The Department acknowledges recognition in Figure 2 of the dPS of the hierarchy of settlements and related infrastructure wheel set out within the RDS at Diagram 3.2 and Diagram 2.2 respectively.
8. The Spatial Growth Strategy (SGS) for the Borough responds to evidence on the role of Bangor and Newtownards as the principal settlements. The Council's SGS also reacts to evidence on the role of the small towns of Holywood within the BMA as a growing digital and creative industry settlement (see para. 7.10 & 7.11, Economic Technical Supplement 5), of Comber and Donaghadee as local centres for housing, employment and facilities and services and the new designation of Portaferry as a small town to reinforce its role and function as an important local centre serving the rural hinterland of the Ards Peninsula. The Department welcomes the approach in sustaining and maintaining the diversity and quality of the villages by encouraging local development and the rural communities in small settlements and the

countryside by facilitating sustainable development of an appropriate scale and character.

9. The Department notes from Table 8 of Appendix 3 of the Technical Supplement 1, Settlement Hierarchy and Settlement Evaluation Technical Supplement that Portaferry has a population (based on 2021 Census) of 2372. This figure is less than the village population of e.g. Ballygowan (3138) while Comber has 9529 and Donaghadee 7325, both also small towns in the dPS Settlement Hierarchy. However, the Department notes the level of service provision in Portaferry in Table 6 of Technical Supplement 1 compared to that of Ballygowan and other villages proposed in the dPS Settlement Hierarchy.
10. The Department would highlight a small typo in the last sentence of para. 2.9 where it should read: *“Strategic Employment Locations (SEL)s shall be recognised, and where necessary providing new, economic development zonings to maintain a generous supply of economic development land”*
11. The Department notes para. 2.11 of the dPS where it states:  
  
*“Small towns will support the principal settlements/**large towns** (Dfl emphasis) and provide opportunities for economic development, retail and services and accommodate residential development in keeping with the location, scale, function and character of the settlement.”*
12. The Department also notes **SGS2 Settlement Hierarchy** in the dPS and where it refers to the Principal Settlements of Bangor City and Newtownards in the top tier. Para. 2.11 (as above) refers to the principal settlements of Bangor and Newtownards as “large towns”. It is acknowledged that Bangor was officially granted city status in 2022 as part of Queen Elizabeth II’s Platinum Jubilee civic honours competition (as stated in para. 2.7 of the dPS) which may lead to confusion in terms of the reference to Bangor as being a large town in para.
13. The Department, however, appreciates that city status is honorary and ceremonial and would accept that this does not necessarily change the planning status of Bangor in the settlement hierarchy or its role within the wider metropolitan area.

## **Strategic Allocation of Economic Development/Industrial Land**

### **An Appraisal of Future Industrial Land Requirements and Strategic Designations**

14. The Department welcomes reference at para. 2.25 of the dPS to regional policy direction of the SPPS (para. 6.92) in terms of “a fundamental role” for LDPs being: *“to ensure that there is an ample supply of suitable land available to meet economic development needs within the plan area.”*
15. Reference is also made in the dPS (para. 2.25) to RD1 (Ensure adequate supply of land to facilitate sustainable economic growth) of the RDS. The dPS reiterates that an adequate and available supply of employment land should be *“accessible and located to make the best use of available services”*, focussing on larger urban centres and regional gateways to take advantage of their location on the regional transport network.

### **SGS 3 – Strategic Allocation of Economic and Industrial Development Land**

16. The Department welcomes the Council’s approach in using The Employment Land Evaluation Framework (ELEF) as per Table 3.1 of the RDS to identify portfolios of strategic and locally important employment sites within the Borough in assessing the quality and viability of sites zoned for economic development. It is also encouraging to see the Council approach in following regional direction under para.3.3 of the RDS in the provision of strategic policy to protect zoned land, promoting economic development opportunities in the hubs/principal settlements and most accessible locations and provide a network of economic development opportunities ensuring an adequate and continuous supply of land for employment purposes.
17. The Department welcomes the provision of a monitoring system on the uptake of employment lands (5th bullet point of SGS 3) which is reflective of regional direction under SPPS para. 6.92.
18. The Council undertook an Employment Land Review (ELR) in 2019 which appears to have been updated in 2025 (Supplementary Document 5C “Employment Land Review Update 2025”) assessing current employment land in the Borough. At para.1.2 of this 2025 Review Report reference is made to a

2022 baseline Employment and Economic Development Land Monitor which was to complement the information provided in the ELR Report. At para.4.1 of the same Review Report it states that Council staff carried out a 2025 Industrial and Economic Development Land Monitor in June and July 2025. It is noted that “the level of change from the previous 2023-2024 Monitor was very minor” (para.4.1). It is concluded at para.5.1 of the 2025 Employment Land Review Update that:

*“Overall, the quantum of zoned employment lands has remained stable within the Borough since [the] date that the last Employment Land Review was carried out. Whilst there are some proposals at a planning or pre planning stage, construction work is only ongoing at two sites – NS 31 at Donaghadee Road Newtownards and BR 11 at Clandeboye Road, Bangor. The development of these lands will result in a loss of 3.23ha of economic development land which is a negligible amount in the context of the amount of such land that remains undeveloped and available for economic development purposes.”*

19. The Department was not able to locate the 2025 Industrial and Economic Development Land Monitor on the Council website and the Council may wish to consider making this information available as part of the plan evidence base.
20. The Department notes that at para.12.1 of the 2022 Land Monitor Report it states that “a total of **203 ha** (Department’s emphasis) of land zoned for industry was surveyed in the five main towns of Bangor, Newtownards, Comber, Holywood and Donaghadee.” This figure features at para. 2.32 of the dPS. At para. 2.32 of the dPS, the Council has indicated that “the aforementioned studies revealed that out of **203.23 hectares** zoned as either existing or proposed employment land, **63 hectares remains undeveloped** (Department emphasis).”
21. The following figures from extant plans (draft BMAP and ADAP) have been provided by Council (Local Development Plan 2022 Supplementary Document 5B, Economic Development Industrial and Economic Land Baseline Monitor Report 2022):

<b>Settlement</b>	<b>Gross zoned existing or proposed (ha)</b>	<b>Gross undeveloped (ha)</b>
Bangor	112	32.2
Newtownards	75.63	28.63
Comber	5.98	4.66
<b>TOTAL OF ABOVE 3 SETTLEMENTS</b>	<b>193.61</b>	<b>65.49</b>
Holywood	X	X
Donaghadee	9.33 (developed for residential)	X
<b>TOTAL OF ALL SETTLEMENTS</b>	<b>202.94</b>	<b>65.49</b>

22. The Department has also noted a minor variation when the above figures are compared with calculations for Bangor, Newtownards and Comber (SEs and Legacy Zonings) from Table 3, *Strategic Employment Allocation* at page 70 and 71 of the dPS:

<b>Settlement</b>	<b>Total area zoned (ha)</b>	<b>Total area remaining (ha)</b>
Bangor	105.51	34.05
Newtownards	64.23	28.63
Comber	4.66	0
<b>TOTAL</b>	<b>174.4</b>	<b>62.68</b>

23. The Department notes the jobs growth anticipated by the Council for the Borough as being 7500 by 2030 (para. 2.33 of dPS) reflective of the Council's job targets as outlined on page 47 of its document "Integrated Strategy for Tourism, Regeneration and Economic Development, Ards and North Down

2018-2023.” The extrapolation of the Council’s Integrated Strategy figure to the plan period date of 2032 gives a figure of 9375 jobs. By the Council’s own admission in the Integrated Strategy this figure is “highly ambitious” and it is acknowledged by the Council that it involves a “high risk of non-achievement”. The Council may wish to clarify the relationship of this figure to that projected by Edge Analytics of 7085 (from 2017-2032) under the most ambitious employment led success scenario.

24. The Department notes the conclusions of the Jettora Report on the Council’s website entitled *“Employment Land Review Supplementary Analysis”* (September 2025) and that this analysis was commissioned by the Council to further supplement the 2019 Employment Land Review to ensure that the supply of zoned employment land identified through the LDP process remains sufficient to accommodate the forecast employment growth. It states:

*“findings are intended to strengthen the evidence base underpinning the LDP’s Spatial Growth Strategy and housing allocations”*(para.1.1).

25. The Department notes the Council’s intention that the LDP will:

*“align with the Councils preferred ‘strategy success’ scenario, and based upon the 25ha allocation figure, concludes that there is adequate existing undeveloped zoned land available to accommodate projected future employment growth in the Borough, both up to 2030 as demonstrated by the ELR, but also to the end of the Plan period in 2032, given the significant oversupply.”*

26. The justification for the oversupply of zoned land at para. 2.37 of the dPS is noted but further clarification would be helpful on the 37.28 ha oversupply figure. It is acknowledged that par 6.92 of the SPPS directs that an ample supply of suitable land to meet economic development needs is required and a range and choice of sites in terms of size and location to promote flexibility and provide for the varying need of different types of economic activity is necessary.

27. The Department notes the inclusion of Map 3 showing the Strategic Employment Land Allocations for the Borough and their accessibility to

transport infrastructure. DfI also welcomes para. 2.38 of the dPS where it indicates that an assessment of employment land provision will be reviewed at LPP stage and refers to stage 3 of the RDS Employment Land Evaluation Framework. This is in line with regional policy provision in SPPS para. 6.92. The Council will be aware that relevant regional policy direction for economic development industry and commerce in the LDP process is outlined in SPPS paras. 6.92- 6.98.

#### **SGS 4 – Strategic Housing Allocation**

28. The Department welcomes the general approach of the Council in setting out the context of its proposed Housing Allocation (15,608 new homes) within the regional direction in the RDS 2035 (RG8) and the SPPS para. 6.139 at paras.2.41 and 2.42 of the dPS.
29. DfI notes reference to the review and update of the evidence base for housing prior to the publication of the Local Policies Plan (LPP) (page 72 footnote 3). The Council is aware the LPP is the second part of the two-stage LDP process and the purpose of the LPP is to set out a council's local policies and site-specific proposals in relation to the development and use of land in its district. The LPP must be consistent with a council's plan strategy and take account of the RDS and any policy issued by the Department such as the Strategic Planning Policy Statement (SPPS).
30. The Department notes the Council's approach in adopting an employment-led approach to setting the strategic housing requirement for the Borough, an approach used by other Councils.
31. The Department notes the "success scenario" jobs growth anticipated by the Council for the Borough as being 7500 by 2030 (paras. 2.33 and 2.48 of dPS). This is reflective of the Council's job targets as outlined on page 47 of its document *"Integrated Strategy for Tourism, Regeneration and Economic Development, Ards and North Down 2018-2023."* The extrapolation of the Council's Integrated Strategy figure to the plan period date of 2032 gives a figure of 9375 jobs. The Department would reinforce the need to monitor the achievement of this objective and revise the plan if necessary as per Part 6 of LDP regulations.

## **SGS 5 – Strategic Housing Allocation across Settlements**

32. DfI would suggest that the title of SGS 5 should be amended to read “*Strategic Housing Allocation across Settlements and the Countryside*” as the allocation includes an allowance to the countryside alongside the settlements.
33. The Department notes and broadly welcomes the Council approach in its strategic allocation of housing across the settlement hierarchy at Table 4 of the dPS. This allocates most of the housing growth (63%) to the principal settlements, 22% to the small towns tier and 10% and 1% respectively to villages and small settlements and it is considered that the Council has reflected the regional strategic objectives for housing in settlements, consistent with regional guidance in the RDS. The Department welcomes the approach used by Council in applying the tests of the Housing Evaluation Framework within the RDS to determine which settlements are most sustainable. This broad evaluation framework has assisted the Council’s judgement on the allocation of housing growth, which is in line with regional direction at para. 3.19 of the RDS.
34. The Department notes the greater allowance of 4% to countryside while the small settlements are receiving 1% in the context of regional direction of achieving appropriate and sustainable patterns of development which supports a vibrant rural community (SPPS para. 6.66). The Department also notes footnote 7 on page 75 and would highlight that 535 as a % of the 15,608 dwellings ANDBC is proposing amounts to 3.4% and not 4%. The Department welcomes the allowance which is based on historic average build rates. The amount of housing in the countryside going forward will be influenced by the housing policies in the LDP and therefore if the Council is successful in achieving the step-change population growth (driven by an increase in working-age people and their dependants) envisaged through their jobs led housing strategy, basing the countryside allowance exclusively on past build rates may be conservative in assumptions (and will require a faithful implementation and monitoring of LDP policies).
35. The LPP is required to be consistent with the allocations/policies in the Plan Strategy. The Department notes how the Council has described the allocation in the Plan Strategy as “*indicative*” (footnote 8, page 77 of the dPS) but would

reinforce that the LPP must be consistent with the Plan Strategy and certainty needs to be a priority for stakeholders to the planning process. Any adjustments must therefore be considered in this context. The Department notes and welcomes reference in this footnote to infrastructure capacity. The importance and necessity for consultation with providers such as NIW during the LDP process is critical. As the RDS directs:

*“any proposed housing development will be dependent on the availability of all necessary infrastructure, including the availability of sustainable water resources and sewerage capacity”* (para. 3.16).

36. The Department would seek clarification from the Council on its reasoning in choosing not to separate the allocation between the villages and small settlements within the Borough but showing this for the first 2 tiers (principal settlements and small towns).

#### **SGS 6 – Management of Housing Land Release**

37. The Department welcomes the inclusion of SGS 6 which is in line with regional direction within SPPS paras. 6.140 and 6.141 and under RG8 of the RDS.

38. Dfl notes footnote 13 on page 79 of the dPS which advises that Phase 1 housing land will include housing zonings within the urban footprint comprising of new zonings and retained legacy zonings. The Department would highlight the importance of assessing the legacy zonings within the plan area in ascertaining the likelihood of whether these will be developed.

39. The Department would reinforce that effective and regular monitoring is key to the *“plan, monitor and manage”* approach. If this does not take place the required responsiveness and flexibility may not be achievable. Monitoring should be an ongoing process with annual reporting and review. It is important to also ensure that the monitoring process being followed is sufficient to yield the information and data necessary for effective housing supply management. The Council’s monitoring framework within the dPS is therefore critical.

40. Dfl notes reference within the Justification and Amplification (J&A) to the provision of necessary supporting infrastructure for any new zonings and would

reiterate that consultation with statutory consultees such as NIW should remain ongoing.

### **Housing Strategy**

41. The Housing Strategy takes account of the RDS and SPPS by promoting higher density housing in town centres and areas with good access to employment, services and transport and ensuring a mix of housing types, sizes, and tenures to create balanced communities. The Department also welcomes the focus within the strategy on design quality and sustainable design to reduce energy consumption and resilience to climate change.
42. Bullet point three currently emphasises higher-density housing in town centres and accessible locations. While this is welcomed, and supports compact urban forms, both the RDS (RG8) and SPPS (p67) indicate that achieving sustainable patterns necessitates recycling land and buildings and making use of vacant or underutilised and brownfield land within existing urban areas to reduce reliance on greenfield sites. The Council may wish to consider revision of bullet point three to better reflect this emphasis.
43. In respect of the final bullet point of the housing strategy, while the reference to supporting rural communities is welcomed, the Department would highlight the RDS approach to sustaining rural communities (SFG13) is not solely about the provision of residential opportunities in the countryside. Instead, it is primarily concerned with sustaining rural towns, connecting urban and rural areas and facilitating the development of sustainable rural enterprises. While this bullet relates to the LDP housing strategy, the Department nevertheless suggests that the Council consider revising to make clear the provision of well-designed homes in the countryside will only support rural communities as part of this wider rural strategy.

### **Economic Development Strategy**

44. In addition to SGS 3, the Department notes the strategic objective for economic development land is to ensure there is a generous supply of suitable land to meet the economic development needs of the Borough over the Plan period, to allocate appropriate economic development land in the key settlements of

Bangor and Newtownards and to provide a spatial framework for the application of economic development policies intended to deliver sustainable and environmentally sensitive economic growth across the Borough, including rural areas. How this is to be achieved is expanded upon with reference to SELs noted in particular. This approach is welcomed and consistent with regional objectives. The Department would also acknowledge the work undertaken to date by the Council and others regarding the Bangor Waterfront Development and Hollywood creative innovation hub.

### **Town centres and retailing strategy**

45. The Department welcomes the overall aim of the Council's retail strategy at page

242. The specific challenge in relation to the revitalisation of Bangor is noted in light of the evidence that Bangor Town centre is underperforming particularly in relation to its comparison retail offer while the convenience retail offer of Newtownards Town Centre could be improved. Both locations sit within the large town centres tier of the Retail Hierarchy as evidenced within the Technical Supplement 1 'Settlement Hierarchy and Settlement Evaluation' which draws upon the tiered evaluation of settlements based on the RDS Infrastructure Wheel (RDS Page 24).

46. Whilst Bangor is noted as a commuter town for Belfast within the RDS (para. 3.41), the Technical Supplement 1 (para. 6.28) indicates the Council's intention to move its civic administrative functions for the borough to Bangor, in addition to the major proposed investment in the Queens Parade, which may refocus it's role over the lifetime of the plan.

47. Portaferry's inclusion as a town in the retail hierarchy is welcomed, reflecting its role as the principle destination for retail and retail services in the lower peninsula area.

48. The production of SPG for retailing is welcomed as it can be a difficult topic for officers and agents to navigate. Clarity on the timing and content of the SPG would be welcomed.

### **Sustainable Tourism Strategy**

49. The Council acknowledges the contribution of tourism to economic growth and the role that the LDP has to play in facilitating that growth through planning policies tailored to the needs and assets of the Borough in line with Regional Guidance 4 of the RDS. The Council provides a useful overview of its tourism assets, and the Sustainable Tourism Strategy promotes sustainable tourism, allowing areas within the Borough to respond to tourist demand whilst safeguarding the integrity of the assets upon which tourism draw depends as required by SPPS para. 6.254. It is noted that the Council's approach to tourism supports outcomes 2,4 and 5 of the Council's Community Plan.
50. The LDP seeks to encourage environmentally sensitive tourism development in sustainable locations to ensure that the Borough's natural and historic assets are protected. These areas are defined in a Hierarchy as 'priority', 'sensitive' and 'protected.' The Council sets out that 'Protected Areas' are "*areas where tourism development will not be approved through the majority of their extent, except in exceptional circumstances*". The Council may wish to consider further guidance on this point in the forthcoming supplementary planning guidance to assist policy application and implementation.
51. The Council states that its Tourism Hierarchy will be achieved by adopting a precautionary approach when considering the impacts of proposed development on a designated heritage asset or a protective or sensitive landscape. The Council may wish to reference sensitive seascapes here also given that the undeveloped coastal zone is a protected area within the Tourism Hierarchy for consistency and clarity.

### **Mineral Development Strategy**

52. The Minerals Strategy, supported by its accompanying text, reflects regional and SPPS policy. The Council's approach at 13.7 sets out the rationale, aligning with the strategic objectives and LDP guidelines set out in the SPPS, linking regional priorities. The Department welcomes the inter-relationship shown between the LDP and the Council's Community Plan outcomes 4 and 5, in line with SPPS para. 5.19.

## **Open space Strategy**

53. The Department welcomes the overview of open spaces, sports facilities and outdoor recreation areas throughout the Borough and the clarification provided on the roles of other bodies and organisations in the management of these facilities. The Council's Open Space Strategy reflects the importance of open space in sustaining and enhancing biodiversity, reducing flood risk, improving air quality and mitigating and adapting to climate change, as well as its role in maintaining and enhancing wellbeing in accordance with the core planning principles set out in the SPPS. The Department also notes that the Open Space Strategy has been prepared in line with outcomes 2,3 and 5 of the Council's Community Plan.

## **INFRASTRUCTURE**

54. RDS RG1 seeks to ensure that an adequate supply of land is provided to facilitate sustainable economic growth and that land should be accessible and located to make best use of services.

55. The SPPS at para. 3.5 states that in furthering sustainable development it is important to manage housing growth in a sustainable way, placing particular emphasis on the important of inter-relationship between the location of local housing, jobs, facilities and services and infrastructure. It is similarly important to successfully integrate transport and land use generally in order to improve connectivity and promote sustainable patterns of development.

## **Transportation Strategy**

56. The Department welcomes the LDP Transportation Strategy which is provided in the context of the Department's Local Transport Study (LTS), the Eastern Transport Plan, Ensuring a Sustainable Transport Future, Planning for the Future of Transport – Time for Change, the RDS and SPPS and seeks to concentrate growth in Bangor and Newtownards which benefits from high connectivity and accessibility whilst encouraging better integration of sustainable transport and land-use, bridging gaps in active travel and sustainable transport infrastructure, as well as promoting parking policies and pricing structures to assist in reducing reliance on private cars and tackling

congestion.

57. The Council lists and displays for information purposes the sections of regionally designated protected routes which are located within the Ards and North Down plan area as required by the SPPS para. 6.301.
58. The Council states that the North of the Borough is served by a train station in Bangor which links directly to Belfast, Portadown and Newry, however since the opening of Belfast Grand Central Station, this is no longer the case, and changes for onward travel from Belfast to Portadown and Newry is now required.
59. The Department encourages continued positive engagement with the Transport Planning and Modelling Unit on the Eastern Transport Plan.

### **Public Utilities, Infrastructure and Connectivity Strategy**

60. The Department notes the Council's Strategy for the sustainable development of telecommunications, digital services and utilities infrastructure. It particularly welcomes the Council's acknowledgement of the role of public utilities and associated infrastructure in social and economic wellbeing.

### **Waste Management Strategy**

61. The background of the relevant context of waste management legislation is welcomed by the Department as it clearly sets out the Council's obligations. The inclusion of the definition of waste management as per the 2008/98/EC Directive is helpful as it defines the activities covered.
62. The Council's waste management strategy and how it will be achieved and the reference to climate change policy is welcomed. It may be prudent for the Council to highlight that climate change commitments and approaches are an evolving area.
63. The Council's position with regard to the matters it will consider in dealing with a waste application (Paras. 24.25 and 24.26) is welcomed as are the commitments by the Council to mitigate potential adverse impacts and restoration after development. In para. 24.28 it may be worth highlighting that this restoration may be phased or post development and may require a rolling

programme of restoration as a waste facility comes to its end of life or changes in products it deals with.

64. The link with waste management and in particular that relating to waste water is welcomed, in particular the need for developers to, “engage with Northern Ireland Water for all new proposed connections, to assess the site-specific needs of the proposal, the wastewater infrastructure capacity and possible solutions for connection” as per para. 24.37 of the dPS. Given the pressure on NIW capacity in certain parts of Northern Ireland this interaction is considered vital.

### **Non-Mains Wastewater Infrastructure Strategy**

65. The Department welcomes inclusion of a Non-Mains Wastewater Strategy within the dPS considering the Climate Change Act (Northern Ireland) 2022. DfI notes and welcomes specific reference under the J&A to RD12 of the RDS which seeks to promote a more sustainable approach to the provision of water and sewerage services and flood risk management. Sustainable development is also at the heart of the SPPS where it seeks to ensure that the planning system contributes to a reduction in water usage and promotes the management of development to safeguard against water pollution, flooding and securing improvements in water quality.
66. Regional direction under para. 3.32 of the RDS states that land use planning authorities and the water industry need to closely cooperate with each other in the preparation of LDPs and long-term water strategies. The RDS also directs that future water demands need to be managed and sustainable surface water management is encouraged.
67. The Department welcomes the inter-relationship shown between the LDP and the Council’s Community Plan at para. 25.8 of page 465 where ANDBC outlines 2 outcomes that are of relevance particularly to the Non-Mains Wastewater Strategy. This follows the regional policy at SPPS para. 5.19 which directs councils to “take account of their current Community Plan when preparing a LDP” as this is the “spatial expression to the community plan, thereby linking public and private sector investment through the land use planning system.”

## **CLIMATE CHANGE**

68. The Department acknowledges the reference to NICCAP 2 at para. 1.82 of the dPS and the Council may wish to note that Northern Ireland's third Climate Change Adaptation Programme (NICCAP3), covering the period 2024–2029, sets the intention to strengthen resilience to the impacts of climate change. Developed in line with the draft Programme for Government, NICCAP3 responds to the UK's 2022 Climate Change Risk Assessment by outlining clear policies and strategies for priority areas.
69. The draft programme, which has recently undergone public consultation, builds on the foundations of NICCAP2 and broadens its scope to address a wider range of climate risks and opportunities. It places a strong emphasis on collaboration across government, industry, and communities to ensure a coordinated approach to adaptation. Publication of the final action plan is subject to Executive approval.

### **Climate Change Adaptation and Mitigation Strategy**

70. Councils have a critical role in helping the Northern Ireland Executive achieve its net zero climate goals, in particular reducing CO2 emissions and adapting and transforming services. Therefore, the Department welcomes the strategic policy included within the Council's dPS to reduce greenhouse gas emissions, in line with the Executive's ambitious climate targets, as set out in the Climate Change Act (Northern Ireland) 2022, including through more sustainable forms of transport and by reducing the need for use of the private car, detailed in Part B (4) of the dPS.
71. The UK's Third Climate Change Risk Assessment (CCRA3) recognises the important role partnership working and collaboration plays in building a climate resilient Northern Ireland. Councils are uniquely placed to utilise their knowledge of local risks to build climate resilience into their local communities. DfI therefore welcome the Council's commitment to publish both a Climate Change and Sustainable Development Strategy and a Local Climate Change Adaptation Plan. The Department acknowledges actions in the dPS to adapt to the impacts of climate change, including through the provision of sustainable drainage solution (hard or soft SuDS) for the management of surface water runoff. Further

comments have been provided in the Departmental response from the Department's Sustainable Drainage Division.

72. Councils also have a key role to play in delivering biodiversity including through their land management and operational activities, through partnership working including and through the Community Plan. The Department therefore welcomes the objective in the dPS to: Protect and enhance the historic Environment and Natural Heritage. The Department also notes the actions included in the dPS to promote biodiversity in line with the Environmental Improvement Plan for Northern Ireland, which aims to provide a coherent response to the global challenges of climate change and biodiversity loss and to address biodiversity and climate simultaneously.
73. The Department recognises its obligations in supporting the wider efforts of the Executive in the transition to net zero emissions as set out in the Energy Strategy, its Action Plan, and the Climate Change Act (Northern Ireland) 2022. The SPPS provides regional strategic planning policy for a range of land uses and must be taken into account by planning authorities when bringing forward their Spatial Growth Strategy within their LDPs.
74. Furthering sustainable development, including mitigating and adapting to climate change, is at the heart of the SPPS. This includes the need to reduce emissions of greenhouse gases that contribute to climate change and to respond to the impacts brought about by climate change. The Department welcomes the approach of the Council outlined on page 99-103 under the Strategic CC1 Climate Change Adaptation and Mitigation:
75. *"The Plan Strategy aligns with regional policy contained in the Strategic Planning Policy Statement for Northern Ireland (SPPS) which require consideration of the interrelationship between the location of local housing, jobs, facilities and services and infrastructure to further sustainable development. The Spatial Growth Strategy seeks to ensure that development occurs in the right place and in a sustainable way."*

## **CC1 Climate Change Adaptation and Mitigation**

76. The Department notes and welcomes bullet point 2 of CC 1 and would query whether the Council has considered whether HE 13 should also be listed under this bullet point given the ref HOU 11 in its policy.

### **Call for Evidence on a potential review of the SPPS in relation to Climate Change**

77. Last year, DfI carried out a call for evidence on a potential focussed review of the SPPS to ensure that it supports the climate change agenda.

78. The responses have now been analysed and will help to inform the options for a potential review of the SPPS in relation to climate change for the Minister's consideration in due course.

### **Coastal Management Strategy**

79. DfI acknowledge the local context to the district provided in the Council's strategic and operational policies for the coast. The NI 3D Coastal Survey from 2021/22 mapped the entirety of the Northern Ireland coastline. A pilot bathymetric LiDAR survey was also undertaken at this time and based on the findings from this pilot, DAERA has now mapped the entirety of the nearshore area (0-10m depth) for all of Northern Ireland and this data will be available early 2026.

80. In order to identify change at the coastline, DAERA did a repeat coastal LiDAR survey of the entire Northern Ireland coastline during summer 2025 and this data is currently being processed and validated. Once this data is finalised this data will assist in identifying how the coastline has changed over the 3-4 year period.

81. The Department is aware that Ards and North Down Borough Council, Newry Mourne and Down District Council and two Councils in Ireland, Louth County Council and Meath County Council combined to seek funding under Ireland's Shared Island Fund (SIF) for a pilot project 'Exploring Sustainable Nature Based Solutions to Coastal Erosion in the East Border Region'. The Department understands the aim is that the Local Authorities will work on a cross-border basis to identify the causes of and investigate nature-based adaptation options to address Coastal Erosion. The Project aims to identify a

number of demonstration sites for testing these innovative solutions, forming the basis for a new investment project.

82. The Department welcomes the alignment of the Council's Coastal Strategy and CO 2, reflecting the current regional policy provision.

### **Flooding and Drainage Strategy**

83. The Department welcomes the alignment of the Council's Flood Risk and Drainage Strategy with the regional policy provision. Please also refer to the comments provided by DfI Rivers and Sustainable Drainage Directorate.

### **Renewable Energy Strategy**

84. The Council is aware that the Department published the SPPS Edition 2 on 11<sup>th</sup> December 2025 which revises the Strategic Planning Policy on Renewable and Low Carbon Energy and also of the letter to all councils dated 21 October 2025 entitled 'Revisions to the Regional Policy Framework for the two-tier system'. The Department notes the Council has undertaken a comparison of its renewable energy policy with the revised regional policy in SPPS Edition 2, as outlined in Table 1 on the Council's website, and the Council's conclusion that the draft Plan Strategy (dPS) continues to take account of the regional strategic approach to renewable and low-carbon energy.

85. The Department also acknowledges the Council's stated intention to consider minor changes following public consultation, including the counter-representation stage, and to consult upon all initial proposed minor changes at the same time, alongside any necessary amendments or addenda to supporting reports as part of the iterative plan-making process. The Council is directed to Development Plan Practice Note 10 (DPPN 10), specifically the guidance on focused Changes as the appropriate mechanism to take forward any alterations to the dPS. For clarity, the Department reminds the Council that minor changes are limited to grammatical or typographical corrections that do not alter the nature or intent of a policy, and therefore any substantive amendments required to ensure alignment with SPPS Edition 2 should be progressed through the focused change process.

## **CROSS BOUNDARY WORKING**

***CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils.***

***CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.***

### **Countryside Strategy**

86. The Department broadly welcomes the strategic policy in relation to the countryside outside designated settlement limits and notes how para. 3.6 of the dPS reflects regional strategic objectives of SPPS para. 6.66. DfI welcomes the inclusion of wording within paras. 3.7 to 3.11 of the dPS which reflects regional direction under SFG 13 (Sustain rural communities living in smaller settlements and the open countryside), SFG 14 (Improve accessibility for rural communities) and SPPS para. 6.69 (strategic direction to cluster, consolidate and group new development).

87. The Department welcomes the inter-relationship shown between the LDP and the Council's Community Plan at para. 3.11 of page 82 which outlines 3 outcomes that are of relevance particularly to the Countryside Strategy. This follows the regional policy at SPPS para. 5.19.

### **CS 1 – Sustainable Development in the Countryside**

88. The Department welcomes the opportunities identified under CS 1 as supporting sustainable development in the countryside. These broadly reflect those under SPPS para. 6.73. Please see Annex 1 for additional comments relating to the operational strategic subject policies.

89. DfI welcomes the emphasis under CS 1 for all proposals in the countryside to comply with CS 5, CS 6 and CS 7 of the dPS as this provides policy on sympathetic integration and the importance of rural character (SPPS paras. 6.70, 6.71 and 6.77).

90. The strategic policy set out here is to be read in conjunction with the General Policy GP 1 in Part C of the dPS and the relevant strategic and operational topic policies in Part D.

### **CS 2 – Rural Landscape Wedges**

91. The Department welcomes CS 2 however would suggest as good practice that a spatial illustration of these rural landscape wedges would be a helpful addition to the dPS.

### **CS 3 – Local Landscape Policy Areas**

92. SPPS para. 6.30 directs Councils to designate LLPAs in LDP documents and to bring forward local policies and guidance to *“maintain the intrinsic landscape, environmental value and character of such areas.”*

93. The Department welcomes the policy provision under CS 3 and would suggest as above that inclusion of a spatial illustration of these local landscape policy areas would be a helpful addition to the dPS.

### **CS 4 – Areas of High Scenic Value**

94. The Department welcomes inclusion of this policy which is line with regional direction under SPPS para. 6.75 where it states that local policies may also be brought forward *“to maintain the landscape quality and character of Areas of High Scenic Value”*.

95. The Department would suggest that a spatial illustration of these rural landscape wedges would be a helpful addition to the dPS.

### **CS 5 – Integration and Design of Buildings in the Countryside**

96. DfI welcomes CS 5 within the dPS and notes the inclusion of content from supplementary planning guidance document *“Building on Tradition: A Sustainable Design Guide for the Northern Ireland Countryside”*.

97. The Council will be aware that this SPG is to be treated as a material consideration in assessing all development proposals in the countryside as directed under SPPS para. 6.78. DfI also notes the Council’s approach at para.

1.56 -1.57 of the dPS in terms of incorporating this SPG into the development plan process.

### **Natural Heritage Strategy**

98. The Department notes the suite of Natural Environment policies and their general alignment with the SPPS and PPS 2. The highlighting of the precautionary approach is welcomed.

### **NE 6 – Areas of Outstanding Natural Beauty (AONB)**

99. The Department notes that this policy is in line with the SPPS para. 6.187 and that council have included an additional criteria in respect of public views of key features. The Department welcomes this enhancement of protection in relation to AONBs.

### **Monitoring**

#### ***CE3 There are clear mechanisms for implementation and monitoring***

100. DPPN 06 states that ‘monitoring is essential for the delivery of the DPD and should provide the basis to trigger any requirement to amend the strategy, policies and proposals of the DPD.’ A Council may revise its Plan Strategy or LPP at any time (after adoption) or by direction by the Department. This requires Councils to keep under review the implementation of DPDs to ensure that LDP objectives are being met. The Department notes the monitoring framework in Annex E of the dPS and welcomes the range of issues identified. Additional comments in relation to the monitoring framework are contained in Annex 1 where relevant.

### **Extant planning guidance**

101. The Department’s website sets out which guidance has been withdrawn, which will cease to have effect in a council area once the Council adopts its Plan Strategy and which guidance is retained, unless and until replaced by the Department. In relation to guidance which will cease to have effect when the Council adopts its Plan Strategy, it is considered that this affords councils the opportunity to prepare local guidance on such matters, if so desired. Additional comments in relation to guidance are provided in Annex 1 where relevant.

102. Further detail on each piece of guidance can be found at: [www.infrastructure-ni.gov.uk/articles/guidance-update](http://www.infrastructure-ni.gov.uk/articles/guidance-update)

103. The Council's paras. 1.56 and 1.57 replicate the SPPS paras. 1.8-1.14, which gives the position on retained DfI Planning guidance and a footnote to the DfI website. The Department welcomes the signpost to the DfI website, however it may not be necessary to replicate the list as this could change over the plan period.

### **Supplementary Planning Guidance**

104. The Council's dPS para. 1.28 says that applicants should check the Council website for forthcoming Supplementary Planning Guidance documents as these will provide further information and guidance on specific areas or topics and will be a material consideration in decision making. Each topic references SPG (within J&A) to say that 'forthcoming' or 'more information' will be provided in the Council's Supplementary Planning Guidance (to be prepared at a later date).

## **Ards and North Down Borough Council Draft Plan Strategy**

**Comments provided by Department for Infrastructure, Rivers Directorate.  
March 2026**

The Department for Infrastructure, Rivers Directorate has reviewed the contents of the Ards and North Down Borough Council Draft Plan Strategy and comments as follows:

### **Vision and Objectives – LDP Vision**

Rivers Directorate welcomes the Council’s Vision and Plan Objectives ‘to ensure that new development in the Borough takes account of the risk of flooding, both existing and in the future, including the need to avoid inappropriate development in areas that are at risk from flooding, or that may increase the risk of flooding elsewhere. Also to design development, including sustainable drainage, to appropriately manage flood risk and surface water run-off’.

### **Spatial Growth Strategy – SGS 1 (Settlement Hierarchy)**

Rivers Directorate also welcomes the Spatial Growth Strategy – SGS 1 (Settlement Hierarchy) whereby in defining settlement development limits at Local Policies Plan (LPP) stage consideration will be given to avoiding risk to human health and wellbeing (e.g. excluding land subject to flood risk).

### **Strategic Housing Allocation – SGS 4**

The use of the Regional Development Strategy (RDS) Housing Evaluation Framework when considering how to distribute the strategic housing allocation among settlements is welcomed, more specifically the Environmental Capacity Test which is ‘an assessment of the environmental assets of the settlement, the potential of flooding from rivers, the sea or surface water run-off and its potential to accommodate future outward growth without significant environmental degradation should be made’.

### **Climate Change Adaption and Mitigation Strategy**

#### **Strategic Policy CC 1 – Climate Change Adaption and Mitigation**

In order to support sustainable development that seeks to mitigate and adapt to climate change and increase local environmental resilience ‘managing flood risk through Policies FLD1 Development in Fluvial (River) and Coastal Flood Plains and FLD3 Development and Surface Water Flood Risk outside of Flood Plains’ will be utilized’.

In addition, the LDP will encourage the use of sustainable drainage systems and features in all developments in line with Policy GP1 General Principles and in larger developments in line with Policy FLD6 Sustainable Drainage.

Rivers Directorate welcomes this policy.

## **General Principles Policy for all Development**

### **Policy GP1 – General Principles**

**Furthering Sustainable Development:** All development proposals will be assessed against and must demonstrate, if appropriate, compliance with criteria such as ‘it utilizes sustainable urban drainage systems as the preferred drainage solution where feasible and practicable to ensure that surface water runoff is managed in a sustainable way’.

**Safety and the Safeguarding of Human Health and Wellbeing:** The development site is not at risk from flooding and the development will not cause or exacerbate flooding elsewhere, taking account of present-day flood risk and potential future risk associated with the impacts of climate change. The Council will use its planning powers to ensure that new development is not located in areas of risk such as flood plains.

Again, Rivers Directorate welcomes this policy.

## **Mineral Development**

### **Policy MIN8 – Water Resources and Flood Risk**

Rivers Directorate welcomes the inclusion of Policy MIN 8 – Water Resources and Flood Risk.

Planning permission will be granted for mineral development where it can be demonstrated that there are no unacceptable impacts on surface water flows. A sustainable drainage solution for the management of surface water run-off will be required for any development that triggers the requirement for a Drainage Assessment under Policy FLD3.

An exception will only be permitted where it can be evidenced that the site is fundamentally unsuitable for a SuDS solution.

Clause 13.49 – where the opportunity exists, restoration proposals should seek to incorporate flood risk reduction measures.

## **Flooding and Drainage**

Rivers Directorate welcomes the ‘**Flooding and Drainage Strategy**’ – to manage development that may be at risk of flooding or that may increase the risk of flooding elsewhere, to protect flood defences and drainage infrastructure and to promote sustainable drainage solutions to improve water quality’.

### **Operational Policies for Flood Risk and Drainage**

#### **Policy FLD1 – Development in Fluvial (River) and Coastal Flood Plains**

Proposed policy aligns closely with existing Policy FLD 1 of Revised Planning Policy Statement 15 “Planning and Flood Risk” but also includes a Climate Change allowance in the flood plain definition.

***Flood Protection/Management Measures*** – Rivers Directorate recommend the amended wording for bullet point ‘land raising (infilling) to elevate a site above the flood level within the undefended floodplain, except within the undefended area where it complies with the criteria listed under bullet point (b)’.

#### ***Justification and Amplification***

*Clause 17.18 – no mention of appropriate height for a flood defence in a ‘defended area’ as per PPS15 FLD1 Clause 6.8.*

Rivers Directorate suggests the inclusion of the following wording as a footnote:

*“The height of a flood defence to top level should include an allowance for freeboard. This is normally 600mm above the design flood level”.*

#### **Policy FLD2 – Protection of Flood Defence and Drainage Infrastructure**

Proposed policy aligns closely with existing Policy FLD 2 of Revised Planning Policy Statement 15 “Planning and Flood Risk” and the Flood Risk section of the Strategic Planning Policy Statement (Edition 2) for Northern Ireland except for the mention of above ground SuDS.

#### **Policy FLD3 – Development and Surface Water Flood Risk outside of Flood Plains**

Proposed policy generally aligns with existing Policy FLD 3 of Revised Planning Policy Statement 15 “Planning and Flood Risk” and the Flood Risk section of the Strategic Planning Policy Statement (Edition 2) for Northern Ireland. However, there is no mention of potential surface water flooding as indicated on the Strategic Flood Map and where it is the developer’s responsibility to assess the flood risk and drainage impact and to mitigate the risk to the development and any impacts beyond. Rivers Directorate recommends that this is included.

Rivers Directorate suggest the inclusion of this within the policy.

#### **Policy FLD4 – Artificial Modification of Watercourses**

Proposed policy aligns closely with existing Policy FLD 4 of Revised Planning Policy Statement 15 “Planning and Flood Risk” and the Flood Risk section of the Strategic Planning Policy Statement (Edition 2) for Northern Ireland.

#### **Justification and Amplification**

Rivers Directorate recommends the inclusion of Clause 6.46 of PPS15, i.e. *‘Where culverting is proposed for other than development purposes, for example a change in agricultural use, then approval may also have to be sought from other relevant authorities. It is important to be aware that such written consents do not constitute planning permission to undertake culverting of canalisation activities. Such an operation carried out without planning permission is a breach of planning control which could result in enforcement action to undertake remedial action.’*

#### **Policy FLD5 – Development in Proximity to Reservoirs**

The proposed policy aligns with existing Policy FLD 5 of Revised Planning Policy Statement 15 “Planning and Flood Risk” and the Flood Risk section of the Strategic Planning Policy Statement (Edition 2) for Northern Ireland. FRD5 also reflects the current thinking of Rivers Directorate, as advised to all Council Heads of Planning on 6th June 2019.

It also aligns closely with suggested wording to Ards and North Down Borough Council from Rivers Directorate in February 2024.

*New section within Policy FLD 5 outlining the circumstances when development will be permitted where sufficient assurance on the condition, management and maintenance regime of the reservoir cannot be demonstrated.*

#### **Justification and Amplification**

Clause 17.48 – number of controlled reservoirs in the Council area requires updating. It is now 15 rather than 19.

Clause 17.50 – new section within this clause dealing with circumstances where new development can be justified within the inundation area of a controlled reservoir

Clause 17.51- new clause confirming that a replacement building will only be permitted where neither a Reservoir Manager agreement nor a signed-off inspection report from an All Reservoirs Panel Engineer is available.

Rivers Directorate suggests a further inclusion to this clause, namely, that the replacement proposal has a like for like building footprint area and does not give rise to an intensification of use.

Clause 17.52 – DfI Technical Guidance Note should read TGN 25 rather than TGN 254.

Under the **Justification and Amplification** heading, Rivers Directorate recommends that the Council consider including the following paragraph.

“Even in circumstances where an impounding structure does not fall within the policy it remains the responsibility of the applicant (or suitably qualified person with demonstrable experience in flood risk management) to consider and assess the flood risk and drainage impact of the proposed development and to mitigate the risk to the development and that beyond the site”.

### **Policy FLD6 – Sustainable Drainage**

No Policy in PPS15. Sustainable Drainage Directorate to comment.

### **Renewable Energy**

#### **Biodiversity, Natural Environment and Historic Environment Interests**

Policy RE1, Renewable and Low/Zero Carbon Energy Development

Clause 21.35 confirms that hydroelectric generation schemes should avoid siting within a catchment with a flow gauging station.

Rivers Directorate welcomes this policy.

### **Waste Management**

#### **Operational Planning Policy**

**Policy WM1 – Environmental Impact of a Waste Management Facility** – proposed site should not be at risk of flooding and will not cause or exacerbate flooding elsewhere.

Rivers Directorate welcomes this policy.

#### ***Justification and Amplification***

Rivers Directorate recommends the following amendment to **Clause 24.26** – the Council will consider flooding from ‘*all sources of flood risk*’ as part of the assessment of proposals for new or extensions to existing waste management facilities.

### **Policy WM2 – Waste Collection and Treatment Facilities**

#### **Justification and Amplification**

Clause 24.33 – 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.

### **Waste Water Treatment Facilities**

Clause 24.35 – where a WWTW is located adjacent to a watercourse or within a flood plain proposals should comply with Policy FLD1 and provide relevant flood assessment details.

Rivers Directorate welcomes this Justification and Amplification with regard to Waste Collection and Treatment Facilities.

### **Monitoring and Review**

#### **The Annual Monitoring Report (AMR)**

Rivers Directorate welcomes the inclusion of Clause 26.6 - indicators and targets include ‘permissions within fluvial or pluvial floodplains which are not considered exceptional cases or of regional significance’.

#### **Also Environmental Objectives**

**Indicator (i)** – New development in fluvial or pluvial floodplains - more than one application approved in any one year contrary to DfI advice unless justified as being of regional significance.

### **Part F Annexes**

#### **Annex J – Flooding and Drainage – Guidance for the Submission of Flood Risk Assessment (FRA) and Drainage Assessment (DA)**

Where reference is made to Q100/Q200 flood plain, for consistency in terminology, this should be changed to the “1 in 100-year fluvial flood plain (AEP of 1%) plus climate change allowance” and the “1 in 200-year coastal flood plain plus (AEP of 0.5%) climate change allowance”. The Q100/Q200 flood plain references also omitted the inclusion of climate change.

**J3** – Rivers Directorate recommend the inclusion of a requirement for pre and post development levels on the site plan.

**J9** – Rivers Directorate recommend that the following clause also include the additional wording:

The DA, as well as addressing surface water flooding, may also need to identify control measures for storm water discharge from the site **and include for its safe disposal of from the site.**

**J10** – Rivers Directorate recommends that the following information should be included in a Drainage Assessment – Flood Control Measures, Flood Mitigation Measures or Safety Procedures as per PPS 15.

Also, there is no longer a requirement included for developers to make an initial application to Rivers for consent to discharge under Schedule 6 of the Drainage (NI) Order 1973 or Pre-Development Enquiry to NI Water. Rivers Directorate recommends that this is included as per D18 of Revised PPS 15.

### **Annex K – Flooding and Drainage – Flood Proofing: Resistance and Resilience Construction**

Largely follows PPS15 but omits E11 – ‘Notwithstanding the various flood proofing measures that may be available to manage and mitigate flood risk, it is stressed that the practice of flood avoidance, by locating new buildings and infrastructure outside the flood risk area, is the most effective means of managing the flood risk. Alternative sites should always be considered’.

### **Technical Supplement 12**

#### **Flooding and Drainage**

**Reservoirs** – Table in **Appendix A** is no longer correct. Only 15 rather than 19 Controlled Reservoirs in the Ards and North Down Borough Council area.

Clauses 5.1. to 5.3 - Living with Water Programme (LWWP) – clarification should be sought from Sustainable Drainage Directorate within DfI as to the current position regarding the LWWP.

*Comments prepared, March 2026.*

**Department for Infrastructure, Rivers Directorate.**

## **Ards and North Down Borough Council Draft Plan Strategy**

### **Comments provided by the Department for Infrastructure's Sustainable Drainage Directorate – January 2026**

The Department for Infrastructure's (the Department) Sustainable Drainage Directorate (SDD) has reviewed the contents of Ards and North Down Borough Council's Draft Plan Strategy and has a number of comments to make on it.

#### **Sustainable Drainage Systems (SuDS)**

SDD notes the references in the Draft Plan Strategy and supporting documents, relating to encouraging the use of Sustainable Drainage Systems (SuDS) as the preferred drainage solution. We welcome the inclusion of these references, as this generally aligns with the current work of the Department to progress policy and legislation in relation to SuDS in new developments.

**Policy FLD6 Sustainable Drainage page 376 – 378** – SDD welcomes the inclusion of a Sustainable Drainage Policy and notes that this generally aligns with the ongoing work within the Department in relation to nature-based (or soft) SuDS, including the introduction of the Water, Sustainable Drainage and Flood Management Bill, which is currently progressing through the Assembly. The proposed powers provided in this Bill will allow the Department to make regulations in relation to the design, approval, operation and maintenance of nature-based SuDS. In tandem with this, the Department held an initial 12-week public consultation from 22 September 2025 to 19 December 2025 on nature-based SuDS in new housing developments. This consultation sought views on the development of policy relating to the future regulation and use of SuDS in new housing developments. For further information, this consultation can be viewed at: [Sustainable Drainage Systems \(SuDS\) in New Housing Developments | Department for Infrastructure](#)

**Policy FLD6 Sustainable Drainage page 376** – the Local Development Plan states 'A sustainable drainage solution for the management of surface water runoff will be required for any development that triggers the requirement for a Drainage Assessment under Policy FLD 3 – Development and Surface Water Risk.'

SDD welcomes this statement, however, it suggests that this requirement should not just be limited to development that requires the submission of a Drainage Assessment (DA) under Policy FLD3.

**Policy FLD6 Sustainable Drainage page 377** – the Local Development Plan states "Hard' SuDS can include permeable paving and oversized surface water sewers with flow control and attenuation tanks. NI Water will adopt such a sewer or drain, which is intended to communicate with the public sewer under an Article 161 Agreement, if all required conditions are met.'

For clarification SDD would advise that NI Water will not adopt permeable paving.

**Technical Supplement 12 – Flooding and Drainage** – Section 5.1 – 5.3 of this document references the Living with Water Programme, under the heading 'Local Policy Context'.

SDD would like to provide the following update on the Living with Water Programme (LWPP):

Within two years of the Living With Water in Belfast Plan being published, NI Water advised of a £700m or 60% increase in the estimated costs of the upgrades needed to the sewerage networks and wastewater treatment works. This increased the Plan cost to over £2.1bn.

An Affordability Review, carried out in response to this increase, concluded that the Belfast Plan is still needed, however the original 12-year delivery timeframe is no longer viable. NI Water will therefore take forward its projects, that are included in the Plan, as normal

business through the Price Control process (PC21, PC28 etc). DfI will continue to develop blue/green schemes in the Plan area.

Delivery of the Plan will be at a scale and pace achievable within available budgets, rather than through a structured programme.

As a consequence, NI Water has deferred delivery of the major upgrades needed to its wastewater infrastructure around Belfast Lough - this includes Sydenham Pumping Station and wastewater treatment works at Belfast, Whitehouse and Kinnegar. Instead, NI Water will focus on additional maintenance to ensure these assets can continue to operate until such times as budget is available to undertake more substantial upgrades.

DfI remains committed to the Belfast Plan objectives to help protect against flooding, to enhance the environment and to grow the economy.

**ARDS AND NORTH DOWN BOROUGH COUNCIL**

**DRAFT LOCAL DEVELOPMENT PLAN**

**COMMENTS FROM DFI TRAM GROUP (Southern Division)**

**(Previously DfI Roads)**

DfI TRAM Group (Southern Division) Local Development Plan Team has considered the content of the Ards and North Down Borough Council draft Local Development Plan 2032.

DfI TRAM Group is largely content with the Draft Plan as written; however, some areas of concern have been noted and, in the interest of road safety and traffic progression these concerns are listed in the paragraphs following.

The following policies are included in this response:

## **Page 55 – Infrastructure Objectives**

- |              |   |   |
|--------------|---|---|
| <b>GP1</b>   | – | <b>General Principles</b>   |
|              |   | <ul style="list-style-type: none"><li>• d) - Access, Movement and Parking</li><li>• J&amp;A 5.35 – Access</li><li>• J&amp;A 5.37 – Movement</li><li>• J&amp;A – Parking</li></ul> |
| <b>HOU4</b>  | – | <b>Accessible and Adaptable Homes</b>   |
| <b>HOU6</b>  | – | <b>Residential Extensions and Alterations</b>   |
| <b>HOU10</b> | – | <b>Replacement Dwellings</b>  |
| <b>HOU12</b> | – | <b>Affordable Housing in the Countryside</b>  |
| <b>HOU16</b> | – | <b>Residential Caravans and Mobile Homes</b>  |
| <b>TRAN1</b> | – | <b>Creating an Accessible Environment</b>   |
| <b>TRAN2</b> | – | <b>Access to Public Roads</b>   |
| <b>TRAN3</b> | – | <b>Access to Protected Routes</b>   |
| <b>TRAN5</b> | – | <b>Disused Transport Routes</b>   |
| <b>TRAN6</b> | – | <b>Transport Assessment</b>   |
| <b>TRAN7</b> | – | <b>Parking and Servicing Arrangements</b>   |
| <b>RET5</b>  | – | <b>Retailing in the Countryside</b>   |
| <b>MIN5</b>  | - | <b>Traffic</b>  |

Comments from DfI TRAM Group have been prepared to relate as far as possible to the published procedural tests and are generally designed to add overall value to the prepared policies. The tests are listed below –

### **Procedural Tests**

P1 Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?

P2 Has the council prepared its Preferred Options Paper and taken into account any representations made?

P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

P4 Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?

### **Consistency tests**

C1 Did the council take account of the Regional Development Strategy?

C2 Did the council take account of its Community Plan?

C3 Did the council take account of policy and guidance issued by the Department?

C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

### **Coherence and effectiveness tests**

CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;

CE3 There are clear mechanisms for implementation and monitoring; and

CE4 It is reasonably flexible to enable it to deal with changing circumstances.

This paper has been cleared for issue by a Director Grade 5 in DfI TRAM Group.

## Page 55 – Infrastructure Objectives

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

The first paragraph rightly gives precedence to sustainable modes of transport, however, given the nature of the council area most people do necessarily rely on private cars for much of their movement due to the rural locations and the availability of public transport, length of commute etc. Suggest some thought given to the last section of paragraph 1, such as –

“providing appropriate opportunities for active travel and integrated sustainable transport where possible to reduce reliance on the use of the private car.”

## GP1 – General Principles

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

d) - Access, Movement and Parking. The first bullet point refers to individual policies that will apply but DfI TRAM suggests that all published policies should be considered particularly the TRAN policies. The emphasis of only some of those policies gives an impression that the others are less important. Suggest using the wording ...Operational Policies AT1 AND TRAN 1 – TRAN 9.

The fifth bullet point refers to the Transport Assessment using the text “... safely manage the vehicular traffic generated by the proposal...” A transport assessment is designed to assess the overall effects of a development where issues other than traffic generation including road safety for all road users including vehicles, pedestrians, cycles etc, for example. DfI TRAM suggests wording might be as follows –

“The existing transport network has sufficient capacity ... accommodate and safely manage any significant change in Travel Patterns including increases in vehicles, cycles or pedestrians, regardless of the size, the Council may require the developer to submit a Transport Assessment so as to facilitate assessment of the transport related impacts”.

and

A standard Transport Assessment Form is included in the Plan at Annex M. Take the opportunity to introduce it in this section of GP1.

“A Transport Assessment Form should be submitted for all development proposals where significant changes in travel patterns might result(\*) to assist the Council in assessing the requirement for a Transport Assessment”. **Appendix A of the Department's Transport Assessment: Guidelines**

(\*) the term all development proposals could be refined to define which proposals need a TAF, e.g. not required for single or maybe less than 5 dwellings / 10 dwellings etc, for insignificant proposals such as many change of use applications, signs and advertising among others where a Transport Assessment will clearly not be required.

#### J&A 5.35 – Access

Refers to published guidance – suggest including that guidance in the text or a footnote.

#### J&A 5.37 – Movement

Includes the text “Roads are public spaces”. Roads are only one aspect of that public space included in the full pavement width, this text should include footways, footpaths and cycleways. For information – footway is a pedestrian facility alongside and contiguous with the carriageway. A footpath runs independently of the carriageway.

#### J&A – Parking

Refers to published standards. Presumably this is the document entitled Parking Standards associated with PPS3. This document plus any Council specific documents should be included in the text.

### **HOU4 – Accessible and Adaptable Homes**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

J&A PARA 7.91 AND 7.92 REFERS TO THE REQUIRED STANDARDS RELATED TO Building Control and LTH. These are not exhaustive sets of guidance and further clarification is required particularly for wheelchair accessible dwellings which require additional space for parking. The following text is suggested as an addition after 7.92.

“Where a wheelchair accessible dwelling, designed in accordance with the wheelchair space standards, has car parking within its individual plot boundary, at least one parking space should be capable of enlargement to achieve a minimum width of 3300mm. Where communal parking is proposed at least two out of every 20 spaces should have a width of at least 3300mm (in accordance with Lifetime Home Standards152 (LHS). Applicants must state within their application that they have complied with the above criteria and demonstrate how the criteria have been met.”

### **HOU6 – Residential Extensions and Alterations**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

Extensions to existing dwellings which result in a significantly larger dwelling than the original may adversely affect road safety and traffic progression as a result of the additional trips generated by the development. Clarification is sought to address this issue and the following wording, or similar is suggested.

"Road safety and traffic progression will not be prejudiced due to the additional vehicular traffic generated by the development"

and

"Adequate and appropriate provision is made for parking generally in accordance with the requirements of Parking Standards. Any reduction to the published Parking Standards will be determined by the Planning Authority".

## **HOU10 – Replacement Dwellings**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

"All Replacement Cases para (e)"

Where the building demonstrates the construction requirements to deem it acceptable for planning permission and has been unoccupied for some time, the development will still result in intensification and parking and access standards should apply in full in these cases. A standard wording would apply to these - "Road safety and traffic progression will not be prejudiced due to the additional vehicular traffic generated by the development" and "Adequate and appropriate provision is made for parking generally in accordance with the requirements of Parking Standards. Any reduction to the published Parking Standards will be determined by the Planning Authority".

Replacement dwellings have often caused DfI major concerns in road safety and parking. Although improvements are encouraged, many developers simply fall back on the existing access argument and offer no improvement or when improvement is offered, the access still falls well short of being deemed a safe access. If a dwelling is to be replaced with a significantly larger dwelling or where it has been unoccupied for a long time, then full standards should be insisted upon.

## **HOU12 – Affordable Housing in the Countryside**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

Such developments are likely to result in additional vehicle trips and pedestrian and cycle activity on the road network and parking and access standards should apply in full in these cases.

Suggest a form of words similar to below –

"Road safety and traffic progression will not be prejudiced due to the additional vehicular traffic generated by the development"

and

"Adequate and appropriate provision is made for parking generally in accordance with the requirements of Parking Standards. Any reduction to the published Parking Standards will be determined by the Planning Authority".

## **HOU16 – Residential Caravans and Mobile Homes**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

Although temporary in nature, the need for adequate access and parking is vital to ensure the safety of all road users and in maintaining adequate traffic progression. The requirements should be reinforced and the following wording suggested –

"Road safety and traffic progression will not be prejudiced due to the additional vehicular traffic generated by the development"

and

"Adequate and appropriate provision is made for parking generally in accordance with the requirements of Parking Standards. Any reduction to the published Parking Standards will be determined by the Planning Authority".

## **TRAN1 – Creating an Accessible Environment**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

### **Bullet Point (a)**

- (a) Facilities to aid physical accessibility e.g. provision of dropped kerbs and tactile paving etc, together with the removal of any unnecessary obstructions.

"Dropped Kerb" is a commonly recognised and mis-used term for the construction of a vehicular access to a residential property permitted on unclassified roads under an Article 80 consent issued by DfI - (<https://www.nidirect.gov.uk/publications/apply-build-or-alter-vehicular-access-dropped-kerb>). Dropped kerbs or droppers, as well as being the term used for private vehicular accesses, is the term given to the sloping kerbs to transition between the full height kerbs and the lowered kerbs. The recognised engineering term for this type of situation to cater for pedestrians and for the avoidance of confusion with vehicular accesses is –

"lowered kerbs or flush kerbs with appropriate tactile paving".

### **Bullet point (b)**

(b) Convenient movement along pathways and an unhindered approach to buildings.

Fully able pedestrians can identify obstacles on their route and negotiate those obstacles safely and without undue inconvenience. For mobility impaired and visually impaired pedestrians in particular, this is significantly more difficult and measures need to be introduced to assist those individuals. Whilst mobility impaired people can identify the obstacles, it is often difficult to negotiate them and visually impaired people may be unable to identify the obstacles at all. There is a clear need to retain a full usable footway width without sharp deviations along the footway and an unhindered entrance to and from buildings. Suggest text to address these issues

“Convenient and safe movement along footways ensuring a clear route of 2.0 metres with no obstructions or sharp deviations and unhindered approach to buildings for all types of pedestrian”. **(Design Manual for Roads and Bridges series 1100 – minimum footway widths to accommodate wheelchair users).**

**OR alternatively**

“Convenient and safe movement along footways ensuring a clear route of 1.8 metres with no obstructions or sharp deviations and unhindered approach to buildings for all types of pedestrian”. **(Creating Places Section 14 – Unobstructed widths for various types of pedestrian).**

**TRAN2 – Access to Public Roads**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

The first bullet point of the policy states that such access will not prejudice road safety or significantly inconvenience the flow of traffic...

This phrase leads the reader to assume that it refers to vehicular traffic and given the fact that a new access may lead directly to the road edge, cross a footway or a cycleway etc, the policy should state i.e. inconvenience all road users.

**TRAN3 – Access to Protected Routes**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

**General Comment**

Protected routes form an important part of the road network by connecting places of significant importance such as ports, airports, major developments etc, and it is vital that free uninterrupted traffic flow should be maximised. Strict adherence to the stated policy is required not only regarding road safety but equally importantly traffic progression. DfI often

offers refusal reasons on protected routes and these can be over-ruled by Council or at appeal by the Commissioner.

Reference should be made to the up-to-date protected routes map which is available using the following link. This may be included in the general text or as a footnote 21. Suggested text -

“Protected Routes are designated main transport routes linking strategic locations on the road network such as ports, airports and other significant developments and access needs to be strictly controlled and minimised on these routes. An up-to-date map of Protected Routes is available using the following link.

<https://dfi-ni.maps.arcgis.com/apps/webappviewer/index.html?id=cbef2552e0d348b8839f9c2aecb050d1>”

### **Other Protected Routes – Outside Settlements Limits**

The first bullet point allows direct access for - replacement dwelling where there is an existing vehicular access onto the protected route. Protected routes by their nature are designed to be main routes between strategic locations resulting in high traffic volumes and an associated risk for safety of all road users. It is therefore important that full consideration is given to road safety and traffic progression and the need for full access and parking standards to be achieved in any development.

Suggested text below –

“Replacement Dwelling - where building... and there is an existing vehicular access onto the protected route, the proposal will be assessed in accordance with DfI’s current published guidance. Where full access standards cannot be achieved, direct access to the protected route will not be permitted.” **(DCAN15 Access Standards published by DfI and TRA2 – Access to Public Roads).**

### **TRAN5 – Disused Transport Routes**

The J&A rightly protects existing green and blue corridors however, no emphasis is put on securing new green and blue infrastructure and further J&A should be inserted to state this aim.

### **Policy TRAN6 – Transport Assessment**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

The policy, although not specific suggests that the Transport Assessment is needed where significant travel (traffic) movements are likely to result. Since a Transport Assessment examines the full range of travel modes – vehicles, walking, cycling etc, the following forms of wording are suggested –

"In order to evaluate the transportation and safety implications of a development proposal which is likely to result in a significant change in travel patterns such as increases in vehicles, cycles or pedestrians, regardless of the size, the Council will require the developer to submit a Transport Assessment so as to facilitate assessment of the transport related impacts".

## **AND**

"A Transport Assessment Form should be submitted for all development proposals where significant changes in travel patterns might result(\*) to assist the Council in assessing the requirement for a Transport Assessment". **Appendix A of the Department's Transport Assessment: Guidelines**

(\*) the term all development proposals could be refined to define which proposals need a TAF, e.g. not required for single or maybe less than 5 dwellings / 10 dwellings etc, for insignificant proposals such as many change of use applications, signs and advertising among others where a Transport Assessment will clearly not be required.

## **TRAN7 – Parking and Servicing Arrangements**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

**Para 22.59** allows for parking reductions in certain situations and demands measures to promote use of alternative forms of transport. Many such measures include time bound packages such as travel cards etc, valid for perhaps six months to one year after which many commuters simply resort to their previous means of travel by private car with inadequate parking available resulting in on street parking, footway parking and parking in other obstructive locations. Having already accepted or promoted a reduced level of parking will result in private cars being driven to those centres with no available parking to accommodate them. The nature of the NI network and the lack of available public transport particularly in rural areas makes reliance on private cars necessary for many people and unless measures can be introduced to remove the timebound elements then parking needs to be very carefully considered such as keeping reduction in parking requirements small in number.

**Para 22.61** uses the term appropriate proportions of parking spaces for disabled users. Various guidance exists for disabled spaces including Creating Places and PPS3 supplementary Guidance Parking Standards among others. These guidance documents should be sign—posted within the policy or J&A.

**Para 22.66** includes welcome text regarding rear servicing facilities, however, this could be widened to include servicing facilities within a designated area within the curtilage of the site. The use of on-street servicing is also unavoidable in some cases and a Service Management Plan may be useful in setting out restrictions etc.

Since loading and unloading is not bound by normal parking restrictions which often results in congestion and negative road safety implications, there is a clear requirement for these deliveries to be properly managed and controlled even in town centres such as timing of

deliveries before / after the peak times. Standalone developments can address the issue easily by careful design of the internal layout to facilitate the range of servicing vehicles expected and ensure that they are accommodated within the curtilage. Any such plan would need to be conditioned in the approval to allow enforcement of the plan. Suggested wording –

“Proposals should be designed to allow servicing and deliveries etc., to take place in a designated area within the site. Where this is not possible, a Service Management Plan may be required to detail numbers, types and timings of expected deliveries to avoid congestion on the road network particularly at peak times”.

(<https://www.gov.uk/browse/driving/highway-code-road-safety>)

## **RET5 – Retailing in the Countryside**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

This policy states that no refuelling station will be permitted if located within 12 miles of an existing station. It also states that the developer is to demonstrate a clear need for such a development. This is unclear whether justification is needed only if it is to be situated less than 12 miles from an existing station or if it is to be justified regardless of location. It is also unclear what may or may not be regarded as a clear need. The Plan should offer some guidance either published in the policy and J&A or alternatively refer to published guidance if it exists.

## **MIN6 – Traffic**

**P2 - Has the council prepared its Preferred Options Paper and taken into account any representations made?**

**C3 Did the council take account of policy and guidance issued by the Department?**

In addition to a suitable access to the proposed development, DfI is conscious of the fact that the existing road network in the vicinity of the proposal may not be capable of carrying the extra vehicle loading due to heavy traffic and an increase in the number of heavy vehicles. The following text or similar is suggested in paragraph 2 of the policy – “planning permission will only be granted where access and the immediate surrounding road network can be satisfactorily improved”.

# **ARDS AND NORTH DOWN BOROUGH COUNCIL DRAFT PLAN STRATEGY**

## **Comments provided by the Department for Infrastructure's**

### **Water and Drainage Policy Division**

**March 2026**

The Department for Infrastructure's Water & Drainage Policy Division (WDPD) has reviewed the contents of Ards and North Down Borough Council's Draft Plan Strategy (The Draft Plan) and has a number of comments to make on it.

***Soundness Test: C3 Did the Council take account of policy and guidance issued by the Department?***

**Comments:** WDPD provided comments on issues through the Council's internal consultation on Draft Plan Strategy policies. There are a number of issues, highlighted below, which the Council will wish to consider.

***Soundness Test: CE4 It is reasonably flexible to enable it to deal with changing circumstances?***

**Comments:** WDPD would encourage the Council to request regular updates from NI Water regarding wastewater capacity in the Council area and to use this information to help inform planning decisions and manage future development.

### **Water and Sewerage Infrastructure**

WDPD welcomes that the Draft Plan highlights the wastewater capacity issues in the Council area and that the Council will continue to work with NI Water to help manage future development and progress the Local Development Plan in a compatible way that takes account of these challenges.

WDPD also welcomes that the Draft Plan states:-

- (i) planning permission will only be granted for development relying on non-mains wastewater management, where the applicant can demonstrate that this will not create or add to a pollution problem. Applicants will be required to submit sufficient information on the means of wastewater management, treatment, and disposal to allow a proper assessment of such proposals to be made. In those areas identified as having a pollution risk, development relying on non-mains wastewater infrastructure will only be permitted in exceptional circumstances, where appropriate mitigation measures have been identified;

- (ii) infrastructure objectives will include providing increased opportunities for water efficiency;
- (iii) that the Resource Test within the Regional Development Strategy's Housing Evaluation Framework will be utilised, which includes assessing water and sewerage capacity, to help determine which settlements are most sustainable and suitable for facilitating and absorbing new development;
- (iv) developers/applicants should engage with NI Water at an early stage, to discuss development proposals and ascertain if adequate wastewater capacity, both within the wastewater network and the wastewater treatment works, is available to serve the proposal; and
- (v) Sustainable Water - A Long-Term Water Strategy for Northern Ireland (2015 -2040)' identifies how planning can impact on flood risk and water quality and the importance of assessing water and wastewater infrastructure capacity, when considering future development proposals.

### **Coastal Development Strategy**

WDPD is content that the Draft Plan reflects the position paper prepared by the Coastal Forum, informing Councils of the need to consider Coastal Change when preparing local development plans.

### **Reservoirs**

WDPD notes the references to reservoirs in the Draft Plan and is content, with a reminder that the Department is currently progressing the further commencement of the Reservoirs Act (NI) 2015 (which provides for the regulation of reservoir safety and places responsibility for reservoir safety on reservoir managers), with the legislation at the Committee for Infrastructure scrutiny stage, following Executive approval in Oct 2024.

### **Local Development Plan 2032 - Technical Supplement Paper 16 - Public Utilities**

WDPD welcomes that NI Water's wastewater headroom capacity spreadsheet has been included, which sets out NI Water's assessment of the current planning status of wastewater treatment works and wastewater networks, as well as each works ability to facilitate growth. Going forward, it will be important that NI Water continues to provide regular updates to the Council regarding wastewater capacity and that the Council takes account of this, to help inform planning decisions and manage future development

**Transport Planning & Modelling Unit (TPMU) response for ANDBC plan strategy consultation**

**Provided 26/02/2026**

TPMU are largely satisfied with this Planning Strategy put to public consultation by Ards and North Down Borough Council subject to a small number of queries which are set out below:-

- Technical Supplement paper 15; Paragraph 3.13 – The document states “Seven objectives” of ETP, however only six are listed. Movements of goods and services objective appears to have been omitted and should be re-instated.

- Plan Strategy; TRAN 9; Paragraph 22.76 (434) – The document states that “It is recognised that the provision of adequate public parking facilities can act as a stimulant to economic development whilst having environmental and safety benefits in locations such as town and city centres which generate a considerable demand”. TPMU does not agree with the assertion that the provision of public parking delivers environmental or safety benefits. There is a well-established correlation between the availability of parking and increased vehicular activity within an area. Higher traffic volumes generally diminish road safety and exacerbate environmental impacts. Moreover, the relationship between parking provision and economic vitality is complex and highly context dependent. Outcomes are influenced by factors such as the level of supply, spatial distribution, and the effectiveness of management measures. In many instances, oversupply, inappropriate siting, or insufficient controls can adversely affect urban liveability, discourage footfall, and ultimately undermine economic performance. Accordingly, TPMU recommends that this statement be removed from the policy text.

- Plan Strategy; TRAN 9; Paragraph 22.78 (435) – The document speaks of Section 76 agreements being a potential tool to deter long-stay commuter parking. Whilst the end goal of this is supported, TPMU is not sure how this can be achieved through such agreements and the description of this should be expanded to offer examples.

Apart from the points raised above, the Strategy should be commended for its coherent approach and its effectiveness in promoting the use of active travel and sustainable transport. Using terms such as “maximized” to promote these travel modes ensures that the wider public understand the goals and objectives of the Council in relation to our future transport system.