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Leona Mc Ginn
LDP Team
Planning Service
Ards and North Down Borough Council
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Newtownards
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15/12/25

Dear Ms McGinn,

Re: Ards and North Down Borough Council Local Development Plan 2032 draft Plan Strategy (dPS).

DAERA welcome the opportunity to comment on the Ards and North Down Borough council dPS.

DAERA has considered the consultation documents, and our opinions are set out below.

Natural Environment Considerations

General Comments

NED are generally content with the policies and note they are largely consistent with existing planning policy. However, our comments below should be taken into account to ensure soundness of the plan.

We welcome GP1 (General Policy) and the acknowledgement that the plan must be considered as a whole and developments need to accord with all the policies and plans outlined in the dPS. NED welcomes the inclusion of the statement 'Proposals must also comply with General Principles Policy GP1 and all other relevant policy provisions of the LDP' within most of the policy boxes for policies and advise this is extended to those that do not include this text as appropriate. We welcome that biodiversity and nature



conservation are largely recognised within the policies if not specifically then with the inclusion of the statement above.

Reference to the potential need for environmental assessments/surveys should be included within GP1.

Consideration should be given to ecological surveys in relation to protected / priority species and habitats in both rural and urban settings. Many urban buildings support swifts and bats and this should be a consideration in urban applications. Rural developments particularly refurbishment, replacement dwelling or industrial developments can have an impact on natural heritage features. Not only by potentially destroying habitat or resting places but by disturbance as increased activity / lighting may have an impact on wildlife species e.g. bats. Through ecological surveys need to be undertaken with protection afforded to these buildings.

General Principles Policy for all Development

We welcome in General Principles (GP1) and throughout the use of the precautionary principle and for all proposals that protection of the environment being paramount unless there are overriding reasons of public interest.

We also welcome that all proposals will be assessed against a number of criteria including 'it protects and where possible enhances the quality and integrity of the natural and historic environment, including the marine environment, and local biodiversity, resulting in the delivery of ecosystem services of benefit to the community'. NED note the addition of the where possible in terms of enhancing biodiversity and would remind the council of their biodiversity duty under The Wildlife and Natural Environment (NI) Act 2011 (WANE (NI) Act 2011). NED advise that all developments should seek to enhance biodiversity and we would be keen to see a stronger statement in relation to this within the policy.

We note and welcome the use of SUDS, open space provision (integrating with green and blue infrastructure), efficient resource usage, encouragement of renewables, protection from unacceptable loss of existing vegetation and landscape features, maximum retention of such features, adequate provision of waste management and availability of essential infrastructure or commitment to its provision within GP1. We note that the additional wording 'if appropriate' has been included when referring to compliance with the criteria, NED would be of the opinion that most of these particularly those relating to Natural Environment would be applied to all development types.



It may be worth noting the potential impacts from light on wildlife within GP1 and other policies that may involve lighting e.g. advertisements, open space, housing and any street lighting schemes.

Housing Urban and Rural Policies

NED welcomes the recognition of the importance of natural heritage and biodiversity in the J&A for most of these policies which seeks to promote and integrate natural heritage and biodiversity into housing schemes. We welcome the recognition of the biodiversity value of such integration, and it is worth noting the contribution integration and enhancement of biodiversity in housing schemes can contribute to the Council's biodiversity duty under the WANE (NI) Act 2011. Housing design itself may also lend itself to integration of biodiversity. We would welcome specific inclusion of biodiversity and Natural Environment in HOU 1.

There could be more emphasis on integrating biodiversity and marrying up open space with biodiversity green/ blue infrastructure. Conversion, reuse and extension of buildings could highlight potential natural environment issues e.g. resting places for protected species.

HOU 10 Replacement dwellings welcome the inclusion of Biodiversity checklist and potential need for other surveys etc. 7.135 – does this need brought out in more of these policies or is ref to compliance with all LDP sufficient. Similar for HOU11 Conversion and reuse of existing buildings.

Open Space

We welcome the recognition and protection from significant detrimental impacts for features of nature conservation importance and biodiversity running through these policies. We welcome the promotion of biodiversity and habitat connectivity through blue and green infrastructure which can benefit the public and wildlife. Again, it is worth noting the value that open spaces and green and blue infrastructure can offer in terms of biodiversity and in the Council's biodiversity duty obligations under the WANE (NI) Act 2011 by creating and enhancing habitats for wildlife. We encourage and welcome the use of native species in planting schemes. We welcome that policy OS9 recognises the potential for lighting to impact biodiversity and the natural environment. NED are of the opinion that similar recognition should be included in the other open space policies for example lighting along watercourses or for the purpose of public safety and design should be cognizant and ensure design of any such lighting is appropriate and wildlife friendly.



Mineral Policy

NED would prefer to see the policy strengthened with regard to commercial peat extraction. We highlight that even degraded peat can be an important carbon store and extraction may lead to carbon release. In addition, poorer quality peat can afford protection to better quality or active peat. The following should be included in defining what is not reasonably capable of restoration “where the hydrology can be repaired and where, with appropriate rehabilitation management, there is a reasonable expectation of re-establishing vegetation with peat forming capability within 30 years” definition from European manual. We would like to have seen in the interest of clarity the requirement for evidence in relation to environmental effects and potential Environmental Impact Assessment (EIA) as per confidential policies. Evidence in relation Environmental effects should be essential for all developments.

We welcome MIN 07 which will secure restoration and aftercare of mineral development sites, we encourage this to demonstrate biodiversity gains and the policy box should make reference to biodiversity enhancement as part of the restoration plan.

We welcome the presumption against exploration for hydrocarbons however this should be within the policy box.

Natural Heritage policies

We note the use of the term ‘where appropriate’ within the Natural Environment Strategy when it comes to enhancement of the natural environment. NED would be of the opinion that this should be a key component and concerned that this wording may weaken the strategy. We consider enhancement an essential part and given obligations under WANE (NI) 2011 the council should ensure this is a strong component of all policies and particularly this strategy.

Please note following the decision of the United Kingdom to leave the European Union, the collective term of “Natura 2000” sites the network of European protected sites are now known as “National Site Network” sites within the United Kingdom, and is including Northern Ireland.

NE 1 – ‘Appropriate mitigation measures in the form of planning conditions may be imposed. we note the wording ‘ In light of the conclusions of the assessment, the Department shall agree to the development only after having ascertained that it will not adversely affect the integrity of the site’ has been removed from the policy box we would prefer to see this reinstated to ensure consistency with current planning policy.



The initial paragraph of NE 1 has been amended, departing from the wording used in the Regulations, SPPS and PPS 2, from “is not likely to have a significant effect on”, to “is not likely to have an adverse effect on”. As the legislation refers to significant effects, we would advise this is amended to be consistent with the legislation and current planning policy.

J&A 14.15 wider marine environment should be wider environment. We welcome this clarification which clarifies that applicants may need to have relevant environmental surveys/assessments carried out. This typo also appears in J&A 14.21, J&A 14.27 and 14.35.

We note ‘The granting of planning permission does not obviate the holder of ensuring legal compliance with other legislative requirements’ has been excluded from NE2 J&A, this should be reinstated.

J&A 14.25 wording ‘and are managed to provide opportunities for research and further study’ this should be reworded as the primary reason for designation is conservation and they may lend themselves to research and educational opportunities.

We welcome the J&A points for NE 2 which include the potential need for environmental survey/assessment, consideration of the effects of lighting and seasonal factors.

Policy NE 4 has removed the word ‘adverse’ which may imply even positive impacts could preclude a planning application from progressing.

NE5 the word ‘only’ as per PPS 2 has been removed from the first line of this policy, NED are of the view that this should be reinstated to strengthen the policy. Removal could be seen as a weakening of the policy. We welcome the additional categories in NE 5.

We welcome the additional supporting evidence to be provided including in relation to lighting for policy NE5. This should be included for all relevant policies.

NE 6 welcome the inclusion of wildlife within the policy box.

We welcome the additional clarification and detail within the J&A of these policies in relation to the potential need for Environmental assessment/survey and the highlighting of using standing advice in order to assist in preparation of planning applications. This has, however, been omitted from NE 3 and NED are of the opinion it should also be included for this policy.



NED welcome the promotion of avoidance as the preferred approach when it comes to habitats and species and the inclusion of the potential need for mitigation as appropriate. We are pleased to see the recognition of the importance of biodiversity and natural heritage beyond those legally protected.

Historic Environment

We welcome the inclusion of flora, fauna, landscape, nature conservation and scientific interest in policy HE 6. It may be worth including similar wording in policies HE 7, HE 9, HE 11, HE 12, HE 13 and HE 14 given the strong interrelationship between the built and natural environment. Many species such as bats and birds may use historic or listed buildings and monuments and there may be opportunities for biodiversity enhancement in relevant applications e.g. incorporation of bat boxes, swift boxes in keeping with the requirements of HED. In addition, Policy HE 13 does not mention compliance with GP 1 and the relevant LDP policies, this should be added to the policy box. It may also be worth noting natural environment issues in policy HE 8 as advertisements may block access to protected species that may use the building as a resting place or any associated lighting may also have detrimental effects on protected species such as bats.

Flood risk and drainage

We welcome the new policy FLD 6 in relation to sustainable drainage.

Outdoor advertisements

We welcome the inclusion criteria f within this policy addressing the potential detrimental effects of illumination of advertisements on biodiversity. Placement of advertisements should also be mindful access for protected species is not obstructed e.g. when placed on buildings.

Renewables

We welcome the addition of peat slide and bog burst as requirements to be demonstrated under wind energy RE 1.

We welcome that as per our previous comments siting of renewables should be outside of peatland areas, NED are keen that the council are mindful that even degraded peat can be a significant carbon store and offer protection to higher quality or active peat. Additionally, siting should also be at a sufficient distance from areas of peatland to not impact the sensitive hydrology of the peatland which can result in desiccation of the peat and the release of carbon stores. We welcome that siting on active peatland will not be permitted except in cases of overriding public interest as per the Habitat Regulations.



Waste

NED welcome the inclusion of restoration plans which offer significant biodiversity benefit within policy box for WM 1. Clearer wording on the need for appropriate environmental assessments may be beneficial.

Marine Plan Team

Draft Plan Strategy:

Policy Context:

The draft Plan Strategy states for the UK MPS that it has had regard to the MPS and that it has taken account of the draft Marine Plan. The Policy Context section could be strengthened by setting out the requirement under marine legislation (both the Marine Act (Northern Ireland) 2013 and the Marine and Coastal Access Act 2009) that the Council has had regard to the UK MPS and the draft Marine Plan in preparing its draft Plan Strategy. The text under 1.53 should be amended to reflect the legislative requirement that the draft Plan Strategy has had regard to the draft Marine Plan.

General Comments:

The terminology used across the draft Plan Strategy, particularly in Chapter 5 and Chapter 16, is inconsistent. Chapter 5 refers to the 'Marine Plan' whilst Chapter 16 refers to the 'Marine Plan' and the 'draft Marine Plan for Northern Ireland'. The Council should consider referencing 'any relevant Marine Plan for Northern Ireland' which would help future proof the Plan Strategy.

References are made to the 'marine environment' in GP 1 (which is specific in relation to the natural and historic environment); the local context under Chapter 12, the J & A under Policy MIN 1; the J & A to Policy NE 1, 2 and 3; the J & A in relation to FLD 3 (specific to coastal and marine water quality); Policy AD 1 in relation to illumination; Policy TRAN 7 (specific to the conservation of the marine environment); and Policy WM 2. However, there are many references to the 'natural environment' or 'the environment' within the draft Plan Strategy. In addition, policies repeatedly require that proposals do not result in 'unacceptable adverse impact' upon the natural environment, or cause 'any unacceptable environmental impact' or use similar wording. It is recommended consideration is given to making explicit reference to the marine environment where these references to the natural environment or environment are made within the draft Plan Strategy policies. For example, Policies RE 1 on Renewable and Low/Zero Carbon



Energy Development and WM 1 on Environmental Impact of a Waste Management Facility. This list is not exhaustive.

It is suggested the wording under the Environmental Objectives and Spatial Growth Strategy could be amended to '*protect, enhance and manage the natural and marine environment*'.

Some policies require that proposals would not result in an 'unacceptable adverse impact on water quality'. In addition, other policies refer to unacceptable impacts on coastal and marine water quality. It is recommended that all of these policies explicitly ensure impacts on transitional, coastal and marine water quality are considered. For example, in Policies WM 1 on Environmental Impact of a Waste Management Facility and WM 2 on Waste Collection and Treatment Facilities.

It is also observed that there is a typographical error in Policy NE 6- Areas of Outstanding Natural Beauty (AONB) which refers to GP 01 instead of GP 1.

Policy GP 1 - General Principles Policy for all Development:

We welcome reference to the Marine Plan in Policy GP 1 and the marine environment under a) Furthering Sustainable Development and b) Design Quality and Respecting Local Character and Distinctiveness.

Whilst Marine Planning Policy is a material consideration in the assessment of planning proposals, it is important that the policy wording accurately reflects the Council's legal obligations under marine legislation, with respect to authorisation and enforcement decisions. It is suggested the following wording could be included in Policy GP 1: 'Where development proposals effect or might effect the whole or any part of the marine area, the Council as a public authority, is required to make decisions in accordance with appropriate marine policy documents, in other words any relevant Marine Plan and the UK Marine Policy Statement, unless relevant considerations indicate otherwise.'

There should also be reference to marine planning policy and legal obligations within the J & A of this policy. The following text is suggested: 'If decisions are not taken in accordance with marine policy documents, the legislation further requires the Council, to state the reasons for not doing so.' It should be emphasised in this policy that this not only applies to decisions on proposals located near or on the coast but also to decisions on proposals that are some distance inland, which have the potential to impact upon the marine area and its environment, as acknowledged in paragraph 16.4 under Coastal Management.

Coastal Management:



Whilst marine policy documents are a material consideration for Coastal Management it is recommended the text referring to the UK Marine Policy Statement (UK MPS) and the (draft) Marine Plan in the Policy box of CO 1 on The Undeveloped Coast, CO 2 on Urban Waterfronts in the Developed Coast and CO 3 on Coastal Change should state 'All development proposals should accord with the relevant Marine Plan for Northern Ireland and the UK MPS, unless relevant considerations indicate otherwise.' It is noted that the wording in Policy CO2 is incorrect as it refers to proposals having regard to Marine Policy documents such as UK MPS and Draft Marine Plan for NI.

The J & A of these policies should fully reflect the legislative requirements for authorisation decisions and state 'Where development proposals effect or might effect the whole or any part of the marine area, Section 8 of the Marine Act (Northern Ireland) 2013 and Section 58 of the Marine and Coastal Access Act 2009 require the Council as a public authority to make decisions in accordance with appropriate marine policy documents, in other words any relevant Marine Plan and the UK Marine Policy Statement, unless relevant considerations indicate otherwise. If decisions are not taken in accordance with marine policy documents, the legislation further requires the Council, to state the reasons for not doing so.' As mentioned under comments in relation to policy GP 1 this not only applies to decisions on proposals located near or on the coast but also to decisions on proposals that are some distance inland, which have the potential to impact upon the marine area and its environment.

It is acknowledged reference to 'seascape' is referred to in the Coastal Management Strategy. It is suggested that it is also included in the J & A section under Policy CO 1. For example, the wording could be amended to read 'aims to provide additional protection for the unique landscape and seascape value and visual amenity of the coastal area'.

It is suggested in paragraph 16.28, that the sentence 'this approach is reflected in the draft Marine Plan for NI, Section 119 - Coastal Processes' be amended to 'this approach is reflected in the Marine Plan for NI', as sections have been updated since the Council last reviewed the Marine Plan.

Marine Strategy

Marine Strategy and Catchments make the following comments on the Ards and North Down Borough Council Local Development Plan 2032- Draft Plan Strategy, Sustainability Appraisal Report and technical supplements.

Local Development Plan 2032

Throughout the Local Development Plan, beaches are mentioned on numerous occasions, along with the long coastline of the borough. However, the nine identified



bathing waters the borough possesses are not mentioned specifically. These could be highlighted in the following sections:

8. Open Space, Sport and Outdoor Recreation

Within this chapter beaches, along with open water swimming, and other recreational water sports are mentioned. The names and locations of the nine identified bathing waters could be incorporated into this chapter to help highlight the importance of physical and mental wellbeing.

12. Sustainable Tourism

This chapter references the borough having 100 miles of coastline, generating tourism from a wide range of outdoor activities, such as water sports, sailing, walking, cycling, and fishing – the nine identified bathing waters could be emphasised here as they create tourism over the bathing season.

Marine Conservation Branch Response

- We welcome the acknowledgement within the LDP and Technical Supplement 11 that Ards and North Down's coastline is of exceptional ecological importance, supporting designated sites such as Strangford Lough MPA (SPA/SAC/Ramsar Site/MCZ), Outer Ards SPA/Ramsar, Belfast Lough SPA/Ramsar, and the North Channel SAC. These areas provide critical habitats for seabirds, marine mammals, and rare benthic communities. The designation of the Undeveloped Coastal Zone (UCZ) Policy CO 1 and the use of the precautionary approach for designated sites are a positive steps towards safeguarding these sensitive areas from inappropriate development and ensure sustainability.
- East Coast Marine Proposed SPA, Strangford Lough MCZ and Outer Belfast Lough MCZ should be consistently considered through all documents as international and National Environmental Designations (including the map1c, Landscape Character Assessment Review, Natural Environment technical report Supplement 9 etc). We acknowledge that these MCZs are listed in the main LDP document, the Technical Supplement 11 - Coastal Management and some sections of supplement 9.
- Policy NE 2 Species Protected by Law should also consider species protected by the Wildlife Order NI.
- Policy NE 5 Habitats, Species or Features o- Natural Heritage Importance should also include MPA features.
- We welcome the consideration of the Draft Strangford Lough Marine Protected Area Management Scheme and the inclusion of Coastal and marine habitats and Harbour porpoise and Common seal in the LBAP.



- We welcome the potential pathways for impact identified in the HRA, including coastal processes, biodiversity disturbance, wastewater, and recreational pressure. We support the conclusion that, with mitigation, the Plan Strategy will not adversely affect the integrity of MPAs.
- We would like to see how projects near the marine area will show they take marine conservation goals into account, especially those needing coastal access like marinas or tourism sites.
- We would welcome site-specific ecological assessments for all proposals within the UCZ, including cumulative impact analysis on designated sites and functionally linked habitats (Policy CO 1).
- For Developed Coast and Urban Waterfronts (Policy CO 2) we recommend nature-based solutions to avoid hard coastal defences that disrupt sediment transport and intertidal habitats and the inclusion of mandatory biodiversity enhancement measures such as habitat creation (i.e. vertipools, nesting etc)
- We recommend prioritising blue carbon habitats (saltmarsh, seagrass beds) in policy wording as natural buffers against flooding and carbon sequestration assets.
- Tourism policies (TSM 1–6) should include safeguards to prevent disturbance to sensitive species such as codes of conduct for wildlife watching and boating to minimise disturbance to seals and harbour porpoise or seasonal zoning or restrictions.
- We welcome the Landscape character assessment review and the inclusion of seascape and coastal erosion – however, we would like to see the word ‘Seascape’ also included in the title of the document. Translating Landscape/seascape sensitivity maps into a web map layer in the [dPS Map Viewer](#) would be really useful.
- Storymap: tabs across the top are useful to jump to sections. We would also suggest adding image attribution.

Coastal Geomorphology Team

Following our review of the Draft Plan Strategy submitted by Ards and North Down Borough Council for their Local Development Plan (2032), we note that we are largely content with this document. This Draft Plan Strategy clearly identifies and takes into account the risk that coastal change can have upon coastal developments, identifying the need to reduce development in vulnerable areas as well as the need to protect the undeveloped coast. The strategy document clearly identifies that coastal erosion and coastal vulnerability data is extremely limited at this present moment, and notes that the



Borough Council will update their plans when this much needed data becomes available. Furthermore, Ards and North Down Borough Council have clearly stated that they will continue to work with the Coastal Forum so that *'key coastal issues within our borough are fully evidenced and soundly addressed in the LDP'*.

While we welcome the significant amount of work that has been put into creating this plan strategy, we would however request that the following issues are addressed to improve upon the existing plan:

Identified sections.

Section 16.6: *Baseline evidence for coastal erosion and land instability along the NI coastline is extremely limited, however the Council shall continue to work collaboratively with DFI and DAERA as part of the Coastal Forum to ensure that key coastal issues within our borough are fully evidenced and soundly addressed in the LDP. DAERA recently commissioned the Northern Ireland Historical Shoreline Analysis Survey which is available to view on the DAERA website.*

We would recommend that further information on the datasets commissioned by DAERA could be provided within this section. We would recommend that the Coastal Change Information tool is referenced in this section. The Coastal Change Information provides scientific interpretation of historical coastal change patterns and offers insights into how our coastline may respond to future challenges such as sea level rise and climate change. We note that further research is necessary to develop coastal vulnerability assessments that can be used to inform coastal management decisions. However, it should be noted that Coastal Forum working group will be making recommendations for future work to develop a comprehensive vulnerability assessment for coastal communities and infrastructure.

Section 16.29: *The policy will also apply to areas of risk which are identified as further information emerges. The DFI publication 'Coastal Erosion Risk Management Report 2019' is a useful starting point in the identification of areas of high erosion risk. This can be viewed on the DFI website.*

We note that this section wrongly references this report. This report was produced by Amey Consulting with HR Wallingford on behalf of DFI and DAERA aiming to carry out a Baseline Study and Gap Analysis of Coastal Erosion in Northern Ireland. While this study does identify areas at potential risk of erosion *'the lack of consistent and comprehensive coastal erosion baseline data in Northern Ireland, the risk ranking of assets is preliminary and by association the veracity and reliability of the vulnerability mapping is low and must be approached with a high degree of caution.'* We would therefore recommend that this section is altered to ensure that the *'Coastal Erosion Risk Management Report 2019'* is correctly referenced.



Peace Plus

We note that the Draft Plan strategy for the Local Development Plan does not reference or comment upon the Peace Plus programme. We note that Peace Plus project '*Coastal Monitoring and Adaptation Planning*' (CMAP) project will help improve coastal monitoring and adaptation planning for a range of areas along the Northern Irish coastline. CMAP is due to finish in 2029 and as such we would recommend that the results collected and produced from CMAP should be utilised and incorporated into future reviews and edits of the LDP. Utilising this resource when it becomes available will help the council to improve its planning for development and adaptation.

The Northern Ireland Coastal Observatory

Ards and North Down Borough Council have noted several of the key coastal datasets collected by DAERA since 2021 throughout the Coastal Management Section. While these individual datasets have been quoted, we note that the overall repository for coastal change datasets collected since 2021 has not been, these datasets have been made publicly available on the Northern Ireland Coastal Observatory which was launched on Friday 20th October 2023 and can be found using the following link:

[Northern Ireland Coastal Observatory](#)

We would recommend that this resource is quoted within the LDP to highlight these datasets and ensure they are considered when assessing coastal change issues.

Conclusion

Overall, we note that the Draft Plan Strategy submitted by Ards and North Down Borough Council for their Local Development Plan (2032) is a good document which clearly takes coastal management and coastal change into consideration. As discussed within this document we would recommend that several refinements are made to the Draft Plan Strategy document to improve the accuracy and usefulness of this plan.

Water Management Unit (WMU) Response

Public Utilities - Development should not create or exacerbate environmental pollution or damage.

Water Framework Directive (WFD) Objectives for waterbodies in the plan area are currently not being met.



The identification of further development land/housing should therefore also acknowledge the need for adequate wastewater treatment infrastructure and treatment capability. Given that such infrastructure in the Plan area is already under pressure combined with WFD Objectives not currently being met for a number of waterbodies in the LDP area, any further development/housing before infrastructure has been put in place or upgraded will exacerbate the difficulties in achieving the WFD Objectives.

The zoning of land and the timing of the release of that land for development should be aligned with the availability of suitable waste water networks and treatment infrastructure to service the developments to ensure there is adequate protection for the water environment.

Flooding and Drainage - Sustainable Drainage (SuDS) - NIEA WMU welcomes this policy position.

Artificial modification of Watercourses - NIEA WMU welcomes this policy position.

Air Quality and Biodiversity Unit Response

AQBU makes the following comments on the North Down Ards LDP and associated documents:

- NED AQBU welcomes the inclusion of objectives within the LDP to protect and enhance the natural environment and safeguard biodiversity (policies ED8 and 9 and NE1,2,3 and 5 in particular refer).

For your information, you may wish to note the following:

- All proposed new development plans/projects should undergo plan and project level HRAs/environmental assessment (ASSIs and priority habitats), which should include assessment of the potential impacts from aerial emissions, including agricultural, industrial, infrastructure and residential developments.
- Consideration should be given to construction and traffic related activities associated with the Plan and if they might trigger a significant air quality effect on nearby sensitive habitats or species. Activities within 200m of sensitive habitats to air pollution should be assessed for potential effects from NOx and dust.
- The Air Pollution Information System [Site Relevant Critical Loads and Source Attribution | Air Pollution Information System \(apis.ac.uk\)](http://apis.ac.uk) contains the modelled NOx, ammonia and Nitrogen deposition levels across the UK and Ireland and information on the impacts of aerial pollutants on sensitive habitats.
- For further information on the impacts of aerial pollutants on sensitive habitats, please contact AQBU@daera-ni.gov.uk



Drinking Water Inspectorate Response

Upon review, we would have the following comments:

- Discussions regarding water resource have been focused on wastewater treatment capacity and storm water discharges. However, we consider it important to consider if new developments will be able to be sourced with a wholesome drinking water supply. NI Water's capability to provide a sustainable source of water to the new developments should be a consideration.
- If NI Water cannot provide a source of drinking water, then an alternative supply should be assessed and confirmed, prior to allowing development.

Land and Groundwater Team Response

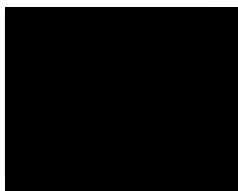
LGW is in broad agreement with the comments in the documents but would like to advise of the following:

Whilst the Sherwood Sandstone aquifer is a significant Groundwater Resource, there is potential for smaller scale exploitation across parts of the rest of ANDBC.

ANDBC overlaps with 4 Groundwater bodies:

Groundwater Body	GWB Type	2021 WFD Classification
Ards Peninsula	Bedrock	Poor
Belfast east	Bedrock	Poor
Enler Valley	Superficial	Good
Downpatrick	Bedrock	Poor

Yours sincerely,



Donna Whelan
Senior Scientific Officer
Countryside Coast and Landscape
Natural Environment Division



Department of Agriculture, Environment and Rural Affairs

