



Armagh City
Banbridge
& Craigavon
Borough Council



Local Development Plan

Preferred Options Paper

Public Consultation Report

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1 Introduction

The Preferred Options Paper (POP) is the first of three main public consultation documents that will be issued during the Local Development Plan (LDP) process. The POP identifies a range of key strategic planning issues which are likely to influence the direction of future development within the Borough, a range of options to address them along with the Council's preferred option. A number of questions were included within the POP, to help gauge public opinion on the identified key issues and the preferred and alternative options put forward to address them.

The purpose of this report is to provide a summary of responses received from both statutory and non-statutory bodies, Section 75 groups and members of the public during the 9-week consultation period. The report outlines the POP consultation process and provides a summary of representations received during the consultation period.

The new Local Development Plan will inform the general public, statutory authorities, developers, investors and other interested bodies of the policy framework and land use proposals that will guide development decisions within the Borough up to 2030. The new LDP is an essential tool in achieving the Council's vision and aims and allows a planning framework to be brought forward which will guide sustainable development, support inward investment and protect and enhance our natural environment. The LDP will support the future growth and related land-use needs of the Borough in terms of housing, employment and services.

The Local Development Plan will consist of two documents;

- **Plan Strategy;** will set out the Council's strategic objectives and strategic policies to facilitate and manage development, along with a spatial strategy that indicates in broad terms the location where different types of development will be accommodated within the Borough.
- **Local Policies Plan;** will set out the Council's detailed policies and proposals (zonings and designations) regarding the future development of the Borough.

This consultation report has been prepared to provide Elected Members, the community and stakeholders (including all those who provided representations) with a summary of the key issues raised in response to the Council's POP, along with officers comments in the issues raised. Whilst not all of the comments raised in the representations have been detailed in this report, they will all be fully considered in advance of the Draft Plan Strategy.

The report follows a similar structure to the POP and is subdivided into 12 sections including:

- Vision, Overarching Principles and Strategic Objectives
- The Spatial Growth Strategy
- Social Theme
- Economic Theme
- Environmental Theme

It also examines comments in relation to the Sustainability Appraisal and EqIA.

2 Purpose of the Preferred Options Paper Public Consultation Report

The POP is a public consultation document that was published on the 28th of March 2018 for a period of 9 weeks, finishing on the 30th of May 2018 at 5pm.

The POP was published alongside a number of other assessments and reports including:

- Sustainability Appraisal Interim Report (Incorporating the Strategic Environmental Assessment)
- Sustainability Appraisal Scoping Report
- Equality Impact Assessment
- 14 Evidence Base Preparatory Papers
- Preliminary Policy Review
- Annual Housing Summary Report

The POP sets out 38 key issues which were identified as being relevant to the Borough. The key issues have emerged from our evidence base, from engagement with Elected Members and from formal and informal consultation with statutory consultation bodies and Section 75 groups.

For the majority of the key issues the POP has identified preferred and alternative options, with justification for the Council's preferred option. In some circumstances only one option has been identified due to there being no reasonable alternative option and the rationale behind this has been explained within the POP document.

A summary of our POP was also made available which primarily focused on the Key Issues and our preferred options to address them.

The Preferred Options Paper Public Consultation Report provides a summary of responses received through consultation, and will be used to inform the new LDP. This exercise is carried out in accordance with Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015. Publication of this report is also in line with the Council's Statement of Community Involvement, where a commitment was made to "Present a Public Consultation Report to the Council's Elected Members following the specified consultation period.

While the Council has fully taken account of representations received within the specified consultation period, this Public Consultation Report contains a summary of the POP representations received, together with the Council's initial response to the comments submitted. As the information contained within the Public Consultation Report is presented in summary form, it has not been possible to capture every issue raised within individual representations. While the report provides a broad overview of the range and nature of comments received in response to the POP, some representations, or elements of them, as submitted, will be considered further as the Local Development Plan process progresses.

3 Consultation Process

Consultation Period

The POP 9-week consultation period began with the launch on 28th March to the close on 30th May 2018 at 5pm

Advertisement

A public notice was placed in the following 7 local weekly newspapers for two consecutive weeks, beginning in the week commencing 2nd April 2018;

- Banbridge Chronicle
- Banbridge Leader
- County Down Outlook
- Dromore Leader
- Lurgan Mail
- Portadown Times
- Ulster Gazette

The public notice included an overview of the content and purpose of the POP, the availability of the POP and supporting documents and identified the various ways in which the public could submit a representation. A list of public engagement / drop-in sessions was also advertised. An example can be found in Appendix B.

Press Release

A press release was published in the 7 local weekly newspapers in the weeks commencing 9th April 2018 and 30th April 2018 and on the Council's website. This press release included quotes from the Lord Mayor and the Chair of the Planning Committee, and a schedule of the public engagement sessions held during the 9-week consultation period.

A reminder was published in all 7 local weekly papers in the week commencing 30th April 2018 to remind the public of the Council's engagement events and how to engage.

Council Website

Notice of publication of the POP was published on the Council's website on 28th March 2018. The Council's website provided a link to POP and all other supporting information. This included 14no evidence base preparatory papers, Sustainability Interim Report (Incorporating the Strategic Environmental Assessment), Sustainability Appraisal Scoping Report, Equality Impact Assessment Report, Preliminary Policy Review and Annual Housing Monitor Report.

Online Questionnaire

An online questionnaire was accessible through the Council's website during the 9-week consultation period. At the end of the consultation period, a total of 17 people had completed the online questionnaire. The online questionnaire largely followed the questions included within the POP document, asking respondents if they agreed with the preferred option put forward for the various Key Issues. The online questionnaire also allowed for respondents to provide further supporting information to their response.

Social Media

Public Engagement sessions were advertised using the Council's social media platforms, Twitter and Facebook, with links to the press release also provided. This helped raise awareness of the POP and associated documents and detailed the upcoming engagement events (Appendix B).

Borough Link – Summer 2018

The POP was advertised in the Summer 2018 edition of the Borough Link Magazine, which is issued to households in the Borough each quarter. The magazine article provided a succinct overview of the Preferred Options Paper and outlined the next stages of the plan process including the preparing the Draft Plan Strategy and the Local Policies Plan, and the further opportunities for public consultation.

Correspondence

Correspondence was issued to a wide range of organisations and individuals to inform them of the publication of the POP and all associated documents. This correspondence was accompanied by either an attachment to the POP and associated documents or hard copies where a letter was issued by post. It also informed them on the availability of the POP and accompanying documents along with a list of public engagement sessions which were being held.

Such groups (Statutory and Non-Statutory) which were notified by either a letter or email included;

- Northern Ireland Government Departments,
- Local Planning Authorities who adjoin Armagh City, Banbridge and Craigavon Borough Council Area,
- NI Water,
- Northern Ireland Housing Executive,
- Civil Aviation Authority,
- Any person to whom the electronic communication codes applies by virtue of a direction given under Section 106(3) of the Communication Act 2003,
- Any person to whom a licence has been granted under Article 10(1) of the Electricity (Northern Ireland) Order 1992,
- Any person to whom a licence has been granted under Article 8 of the Gas (Northern Ireland) Order 1996.
- Political Representatives
- Section 75 Groups (held on the Council's S75 database)
- Monaghan County Council

Public Engagement Events

POP Launch Events

The POP launch was held on 28th March 2018 in the Palace Demesne, Armagh. This event was attended by a range of stakeholders and statutory consultees including Elected Members, Council officials and representatives from adjoining Council's.

Public Engagement Sessions

A total of 20 public engagement sessions were held in 7 urban and rural locations across the Borough. Each public engagement session was attended by a minimum of 2 Planning Officers. Hard copies of the POP were available at public engagement sessions for attendees to take home, whilst office copies of accompanying documents including evidence base preparatory papers were available to view. Display boards were set up which displayed a number of key maps included within the POP.

There were a total of 114 attendees across the 20 sessions set out below.

Public Engagement / Drop- In Sessions Date	Event Type	Location
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Tuesday 10 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm – 7.30pm)	The Palace Demesne Friary Road Armagh BT60 4EL
Wednesday 11 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm – 7.30pm)	The Palace Demesne Friary Road Armagh BT60 4EL
Wednesday 18 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm – 7.30pm)	The Old Town Hall 1 Scarva Street Banbridge BT32 3DA
Thursday 19 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm – 7.30pm)	The Old Town Hall 1 Scarva Street Banbridge BT32 3DA
Tuesday 24 April 2018	Public Engagement Session Afternoon (1.30pm – 3.30pm) Evening (5.30pm – 7.30pm)	Millennium Court Arts Centre William Street Portadown BT62 3NX
Friday 27 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm – 7.30pm)	Brownlow Community Hub 7 Brownlow Road Craigavon BT65 5DL
Tuesday 1 May 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm – 7.30pm)	Tommy Makem Arts & Community Centre 7 Cow Fair Keady Armagh BT60 3UE
Friday 4 May 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm – 7.30pm)	Brownlow Community Hub 7 Brownlow Road Craigavon BT65 5DL
Tuesday 15 May 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm – 7.30pm)	Rathfriland Community Centre John Street Rathfriland BT34 5QH

Tuesday 22 May 2018

**Public Engagement
Session**

Afternoon (1.30pm -
3.30pm)

Evening (5.30pm –
7.30pm)

Lough Neagh Discovery
Centre
Oxford Island
BT66 6NJ

Preferred Options Paper - Consultations Issued

Consultation was carried out with a total of 719 groups, organisations and individuals (both statutory and non-statutory) as part of the POP process. Numbers relate to valid consultations issued and received (undelivered consultations not included).

Statutory Consultees comprise the 7 categories detailed in Part 1, Section 2 (Interpretation) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015. Non-statutory Consultees comprise all other consultees not falling within the statutory legislative definition.

Full details of consultations issued to statutory and non-statutory groups can be found at Table 1, below.

Table 1. Consultations issued to Statutory and Non-statutory Groups

POP Consultation Exercise – Overall Summary					
Consultee Type	Consultee Group	consulted by EMAIL	consulted by POST	TOTAL Consulted	RESPONSES received
Statutory (8 Groups)	Government Departments (9)	8	1	9	4
	Neighbouring Councils (4)	4	0	4	4
	Northern Ireland Water (NIW)	1	0	1	0
	Northern Ireland Housing Executive (NIHE)	1	0	1	1
	Civil Aviation Authority (CAA)	1	0	1	0
	Electronic Communications Network Providers (132 Licences)	73	45	118	8
	Electricity License Holders (97 Licences)	28	38	66	2
	Gas License Holders (28 Licences)	19	4	23	1
Non-statutory (13 Groups)	Section 75 / Community Groups – Regional	135	0	135	0
	Section 75 / Community Groups – Local	118	158	276	0
	Regional Organisation / Interest Groups	Not formally consulted			4
	Architect / Agent	Not formally consulted			60
	Local Business	Not formally consulted			5
	Local Interest Groups (3)	Not formally consulted			19
	Member of Public / Individual	Not formally consulted			87
	Monaghan County Council	1	0	1	1
	Elected Rep. 1 – Members of Parliament (MP) / Constituency Offices	5	0	5	0
	Elected Rep. 2 – Members of Legislative Assembly (MLA) / Constituency Offices	25	0	25	2
	Elected Rep. 3 – Elected Members (Council)	41	0	41	0
	Pre-POP Respondents	2	0	2	0
	Other	Not formally consulted			3
Totals		462	246	708	201

In addition, 11 consultations were issued internally to the Council.

Approach to analysis of responses

A total of 201 responses were received during the consultation period, these included a wide range of comments in relation to the POP, supporting documents and the POP consultation process.

Every representation received during the public consultation period was carefully examined so that each individual comment relating to the POP could be aligned with the relevant Key Issue or section. It is important to note that representations received often included comments on more than one Key Issue.

For analysis purposes and to provide an overview of the public consultation responses, all comments received were aligned with one of the following response categories:

- **Generally supportive-** comments were judged to be generally supportive of the proposed approach. Issues or concerns may have been raised but were overall supportive of the approach.
- **Unsupportive-** comments were judged to be unsupportive of the proposed approach.
- **Non-committal or Unclear-** an opinion on the proposed approach was not offered or the statement that the respondent had made was unclear.

Please note that many of the respondents, although they provided detailed responses, did not explicitly state whether they were supportive or otherwise of a preferred approach. Such representations were categorised based on the general nature of the response which involved a thorough and balanced consideration of all comments made. Every comment received, regardless of whether it is categorised as being supportive, unsupportive, or non-committal / unclear will be fully considered in the preparation of the Plan Strategy.

Please note that a small number of respondents (6 No.) requested that their representation is treated as 'confidential'. Whilst the specific comments made in these responses have not been detailed in this report, they have been included in the statistics that are presented. All representations, confidential or otherwise, will be fully considered in the preparation of the Plan Strategy.

Statutory / Non-Statutory

Responses received from statutory, non-statutory and from the online questionnaire have been collated together to provide an overview as to the level of respondents who were generally supportive, unsupportive or as providing a non-committal / unclear response to the preferred options. This is captured in graphs to provide a quick visual overview of whether respondents were supportive or not of the Council's preferred approach.

Elected Representative Comments

A LDP Workshop was held on Thursday 22nd November 2018 to provide the Elected Members with a summary of the results of the consultation exercise carried out in respect of the POP and the supporting documents.

Although the workshop focused on the strategic level Spatial Growth Strategy (SGS 1, 2 & 3) and the Key Issues that raised particular interest through the POP representations, it provided Members with an opportunity to discuss the results of every Key Issue detailed in the POP and make further comments or recommendations for the LDP Team to consider.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. This Public Consultation Report includes a brief recap of the Preliminary Policy Review, detailing the current operational planning policies relating to each Key Issue, as appropriate.

Furthermore, this report will summarise the recommendations that were made by the Council in respect of specific planning policies, including suggestions where policy could be tailored to the local circumstances of the Borough.

It is important to note that a more detailed policy review will be carried out in advance of the draft Plan Strategy.

4 Vision, Overarching Principles and Strategic Objectives

The Vision for the LDP was developed from the relationship between the LDP and the Council's Corporate and Community Plans. In the POP this vision along with the overarching principles and strategic objectives further explored this relationship and informed the key issues and preferred options as set out in the Preferred Options Paper.

This section deals with responses to:

- Vision, Overarching Principles and Strategic Objectives

Vision, Overarching Principles and Strategic Objectives

Vision

The POP identifies that the Council has a key role in meeting the needs of citizens who live and work in the Borough through the provision of services directly, or with other partners. Due to the close relationship between the LDP and the Community Plan, the LDP vision is reflective of the Community Plan vision. With the LDP vision, emphasis is placed on land use and the creation of quality places.

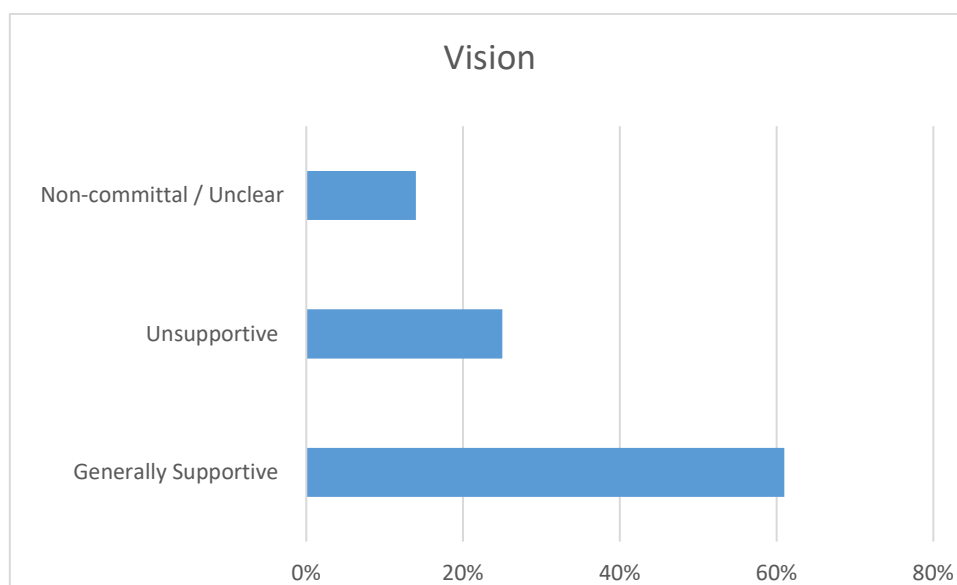
The LDP Vision is:

“Armagh City, Banbridge and Craigavon Borough will be a place of choice to live, work and visit with a vibrant and sustainable economy supported by a healthy and connected community.”

LDP Vision Response Rate: 18%

36 of the 201 representations received made comments in respect of the LDP Vision.

- 61% of the responses were generally supportive of the preferred approach;
- 25% of the responses were unsupportive of the preferred approach; and
- 14% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the LDP Vision

61% (22 No.) of the representations were supportive of the LDP Vision. Although many of these representations did not substantiate or justify their support, some of the comments that were received are detailed below.

- The importance placed on the promotion of a vibrant and sustainable economy in the LDP Vision is welcomed (POP ref 130).
- The LDP Vision is forward thinking and recognises the need for sustainable development- balancing the needs of protecting the environment, promoting prosperity and economic development are key pillars of the statement (POP ref 199).

- The alignment of the LDP Vision and the Council's Community Plan Vision is welcomed (POP ref 174).

Critique of the LDP Vision

A quarter (9 No.) of the respondents were unsupportive of the LDP Vision. Some of the comments and suggestions that were received are detailed below.

- The LDP Vision does not go far enough in assessing, evaluating and protecting local heritage, in terms of archaeological sites, built heritage and culturally important aspects of the area (POP ref 002).
- The environment should be at the vanguard of the LDP Vision, without a sustainable and protected environment, none of the other aspirations are possible (POP ref 064).
- An important opportunity has been missed by not referencing the historic environment in the LDP Vision- the Borough's unique heritage offering should have been a key consideration to ensure that the Council's local identity, character and authentic places are acknowledged at the outset (POP ref 080).
- The LDP Vision does not recognise that the environment is not just the background for the life and future of the Borough, it is the key connection between people and place (POP ref 142).
- The LDP Vision does not go far enough to further sustainable development, with no regard to the protection and enhancement of the natural environment (POP ref 135).

One of the respondents considered that the LDP Vision should be refocused and rebalanced to reflect the built and natural environment objectives of the LDP and also further refined to make it more locally distinct through reference to the future vision for key settlements or unique assets within the Borough (POP ref 113).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to the LDP Vision. Initially the Elected Members expressed concern that there was not a greater level of support for the LDP Vision. However, after discussion, it was acknowledged that the vision is normally expressed in strategic terms and therefore open to interpretation by different individuals. On that basis Members deemed that the level of support for the LDP Vision was acceptable.

It was considered that the emphasis of the LDP Vision should be on land-use. It was also recognised that although the Council has a statutory duty to take account of the Community Plan, the Council also needs to acknowledge the environment, both built and natural.

Our comments

Support for the vision is welcomed.

Further consideration will be given to all constructive criticism and suggested improvements to the LDP Vision in advance of the draft Plan Strategy.

It is considered that the Key Issues identified in the POP, and the justification for the preferred options, highlight the Council's commitment to supporting urban and rural communities, protecting the environment and facilitating inward investment and development in our Borough, in a way that is appropriate and sustainable.

Overarching Principles

The development of the LDP is underpinned by 5 Overarching Principles which are based on the core principles contained in the Strategic Planning Policy Statement (SPPS), but which are tailored to reflect the LDP vision and to reflect the aims of the Council's Community Plan and Corporate Plan. The Overarching Principles are:

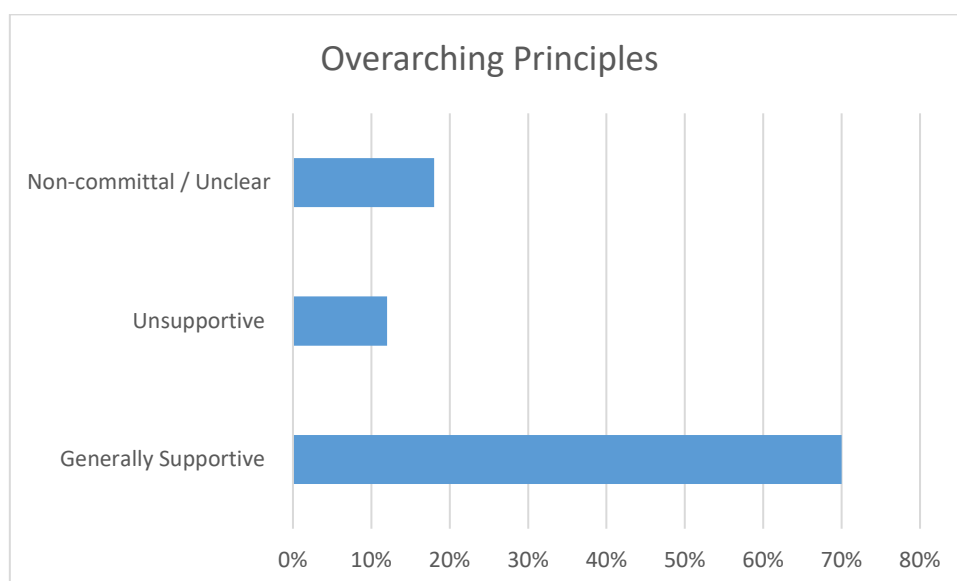
1. Improving health and well-being;
2. Enhancing connectivity and accessibility;
3. Supporting sustainable economic growth of the Borough;
4. Managing and protecting our built and natural environment; and
5. Supporting quality of design and place making across the Borough.

The Overarching Principles informed the LDP's Strategic Objectives and the Council's overall LDP approach as set out in the Preferred Options.

Overarching Principles Response Rate: 16%

33 of the 201 representations received made comments in respect of the Overarching Principles.

- 70% of the responses were generally supportive of the preferred approach;
- 12% of the responses were unsupportive of the preferred approach; and
- 18% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the Overarching Principles

70% (23 No.) of the responses were categorised as being supportive of the Overarching Principles. Some of the comments and suggestions that were received are detailed below.

- Each of the Overarching Principles will support the advancement of the area (POP ref 176).
- The recognition that heritage assets are not limited to designated elements but also make a vital contribution towards the character and identity of an area is welcomed (POP ref 180).

Although several representations acknowledged their support for the Overarching Principles, they also offered suggestions on how they may be improved, including:

- The importance of open space and the natural environment should be reinforced (POP ref 064) and economic growth should be prioritised in the LDP Vision (POP ref 083).
- Greater cognisance should be given to mitigation and adaptation of climate change and also the importance of ecosystem services (POP ref 135).

Critique of the Overarching Principles

12% (4 No.) of the responses were categorised as being unsupportive of the Overarching Principles. Some of the comments that were received are detailed below.

- Economic growth is not everything, as continued use of the land for economic growth does not necessarily make for a better environment (POP ref 006).
- Heritage has not been fully appreciated; it has not been recognised that the environment is not just the background for the life and future of the Borough, it is the key connection for people and place and makes a key contribution to all of the objectives (POP ref 142).

Although they did not agree with the Overarching Principles, one of the respondents advised that it was gratifying to see that the Council is keen to take a holistic approach to development, which recognises the importance of our environment in all its aspects to our health and well-being (POP ref 181).

Almost one fifth of the responses (18% / 6 No.) received in respect of the Overarching Principles were categorised as being non-committal or unclear. Whilst these responses did not offer a specific opinion on the Overarching Principles, several of them made comments or suggestions which are detailed below.

- Locally sourced products made by local people help develop healthy safe and inclusive communities. Local concrete products can deliver design objectives on visual impact, climate change, resilience, and improve energy efficiency in homes and workplaces (POP ref 062).
- The Council should consider how they complement / add value to the 5 core planning principles in the SPSS (POP ref 113).
- More consideration should be given to how the principles propose to fulfil Section 75 duties of the NI Act 1998 (POP ref 147).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to the Overarching Principles. Members also acknowledged that the environment, both built and natural, is reflected in the Overarching Principles.

Our comments

Support for the Overarching Principles is welcomed. It is considered that the order of any principle does not denote its importance, none of the overarching principles are deemed to take priority over the other in the interests of furthering sustainable development. Further consideration will be given to the requirement for overarching principles within the Draft Plan Strategy.

Strategic Objectives

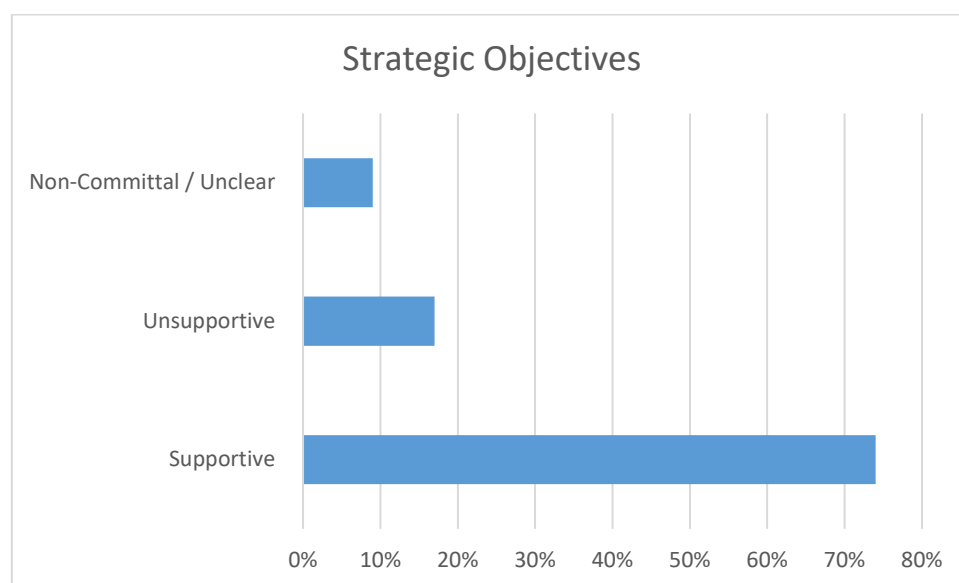
In order to fully realise its vision, the LDP is supported by social, economic and environmental Strategic Objectives. Strategic objectives were developed taking account of the regional direction set out in the Regional Development Strategy (RDS), the Sustainable Development Strategy, the Strategic Planning Policy Statement and other regional policy. The Strategic Objectives set out in the POP are as follows:

Social Objectives	Economic Objectives	Environmental Objectives
• To further develop Armagh City, Banbridge and the sub-regional Craigavon Urban Area* as the main hubs for growth. • To support the role of local towns and villages as attractive and vibrant local service centres providing a level of development appropriate to their position in the settlement hierarchy. • To support rural communities by providing appropriate and sustainable opportunities for development in the countryside. • To provide a sufficient supply of land for new housing to meet the housing needs by 2030. • To facilitate the diverse range of specific housing needs over the Plan period. • To facilitate community safety and shared spaces through high quality designs and layouts of proposed schemes. • To facilitate development of community and cultural facilities at locations accessible to the local communities they serve. *Craigavon Urban Area consists of Portadown, Central Craigavon and Lurgan.	• To facilitate the creation and maintenance of conditions that provide for a dynamic, diverse and robust economy to encourage existing and new businesses to invest. • To facilitate the growth of the economy by ensuring an adequate provision of accessible land for a range of employment uses which offers a choice of sites at a range of locations. • To support, regenerate and promote vibrant town centres. • To support tourism development by creating and identifying opportunities for sustainable tourism development and by safeguarding key tourism assets from inappropriate development. • To promote Armagh City as a major tourist destination while respecting its unique built heritage assets, cultural product and unique setting through sensitive development. • To facilitate economic development of an appropriate nature, scale and location in the countryside; including employment in the primary sector (agriculture, forestry and mining); while recognising the growing importance of self-employment, homeworking and farm diversification. • To facilitate economic regeneration and support the connectivity of disadvantaged and deprived areas. • To facilitate investment in power, water, sewerage infrastructure and waste management, particularly in the interests of public health. • To facilitate physical and digital connectivity which meets the needs of businesses and private households. • To protect strategically important transportation and public utilities infrastructure and where possible enhance connectivity within the Borough and with other centres	• To conserve, protect and where possible enhance the natural and built environment to improve biodiversity, achieve quality design and promote health and well-being. • To promote sustainable high quality design in all developments to assist with climate change adaptation and place-making. • To prevent inappropriate new development in areas known to be at risk of flooding or that may increase the flood risk elsewhere and put in place measures to assist in flood risk management. • To protect and develop networks of green and blue spaces to support biodiversity and habitats and promote health and well-being. • To facilitate integration between land use, planning and transportation to encourage a shift to more sustainable and active modes of transport. • To safeguard unique sensitive landscapes from inappropriate development. • To protect and enhance the network of open spaces in the Borough and promote opportunities for connections to create an enhanced network of pedestrian paths, cycleways and ecological corridors to improve linkages throughout the Borough. • To support the generation of energy from renewable sources in appropriate locations whilst affording protection to the environment including sensitive or vulnerable landscapes.

Strategic Objectives Response Rate: 23%

47 of the 201 representations received made comments in respect of the Strategic Objectives.

- 74% of the responses were generally supportive of the preferred approach;
- 17% of the responses were unsupportive of the preferred approach; and
- 9% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the Strategic Objectives

There was a relatively high level of support for the Strategic Objectives, with approximately three quarters (35 No.) of the respondents indicating their support. Some of the comments that were received in respect of the Strategic Objectives are detailed below.

- The Strategic Objectives seek to cover all the necessary areas and are clear in what they wish to achieve; they are broad expressions of how they will facilitate the overall LDP Vision (POP ref 148).
- The Strategic Objectives will facilitate the creation and maintenance of conditions that provide for a dynamic, diverse and robust economy to encourage existing and new businesses to invest (POP ref 130).

One of the respondents, whilst supportive of the renewable energy objective, considered that the merits of solar energy and the links with economic development, job retention and creation in the Borough needs to be developed further (POP ref 199).

It was also notable that a significant number of the representations expressed their particular support for the following Strategic Objectives:

'To support rural communities by providing appropriate and sustainable development in the countryside'; and

'Provide a sufficient supply of land for new housing to meet the housing needs by 2030'

(including, but not limited to POP refs 112, 119, 121, 123, 127, 136, 139, 141).

Critique of the Strategic Objectives

17% (8 No.) of the responses were categorised as being unsupportive of the Strategic Objectives. The statements below illustrate the variety of comments that were received.

- Developing a major tourism strategy for Armagh is the wrong direction; Armagh should instead use its history to become a modest tourist centre as substantial investment is needed in other areas (POP ref 004).
- It has not been recognised that the environment is not just the background for the life and future of the Borough, it is the connection between people and place and makes a key contribution to all of the objectives (POP ref 142).
- The Strategic Objectives are currently in three isolated silos and there needs to be greater inter-relationship between them (POP ref 135).
- The Strategic Objectives as presented, are tailored to and influenced by, the proposed Settlement Hierarchy, therefore if one does not agree with the Settlement Hierarchy it is impossible to judge the Strategic Objectives (POP ref 188).

A number of the respondents who were unsupportive of the Strategic Objectives offered suggestions on how they may be improved. Examples of the suggestions are detailed below.

- The historic environment could be better reflected across the 3 themes (POP ref 080).
- The Strategic Objectives should be directed more intensely towards assessment and protection of heritage (POP ref 002).
- Mitigating and adapting to climate change could be significantly strengthened in the Strategic Objectives (POP ref 135).
- The terms contaminated land, brownfield regeneration and waste management are not included and should be central to any environmental objectives (POP ref 082).
- The Councils perspective on sustainable development should be altered to prioritise economic objectives. In light of economic uncertainty, the Borough could be bolder in facing the challenges ahead (POP ref 083).
- The Strategic Objectives require some enhancement to ensure that they are all set within environmental limits which have sustainable development at their core (POP ref 135).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to the Strategic Objectives. The Elected Members discussed the requirement for a Monitoring Framework which will be brought forward in the preparation of the Draft Plan Strategy. It was acknowledged that this framework would set out specific indicators that measure how the LDP Strategic Objectives are being delivered and ensure that the policies are being implemented properly.

Our comments

The strategic objectives have been developed taking account of regional direction set out in the Regional Development Strategy 2035 (RDS), the Sustainable Development Strategy, the Strategic Planning Policy Statement, other regional policy and the Council's Community and Corporate Plans.

A full review of the Strategic Objectives will be carried out in advance of the next LDP stage. A framework for monitoring the strategic objectives will also be developed as part of this stage.

5 Spatial Growth Strategy

The proposed Spatial Growth Strategy in the Preferred Options Paper set out the Council's intended framework for allocating growth across the Borough. It was based on the Regional Development Strategy (RDS) 2035, which sets objectives for promoting population growth and economic development in the main Hubs and sustaining communities living in smaller towns, villages, small settlements and the open countryside.

This section deals with the following Key Issues:

Key Issue SGS 1: Defining a Settlement Hierarchy

Key Issue SGS 2: Allocating housing

Key Issue SGS 3: Allocating economic development lands

Spatial Growth Strategy

Preferred Option, for Key Issue SGS 1 (Defining a Settlement Hierarchy)

Option SGS 1A

Bring forward a new settlement hierarchy through reclassification of existing settlements where appropriate, and to include new settlements / new settlement nodes:

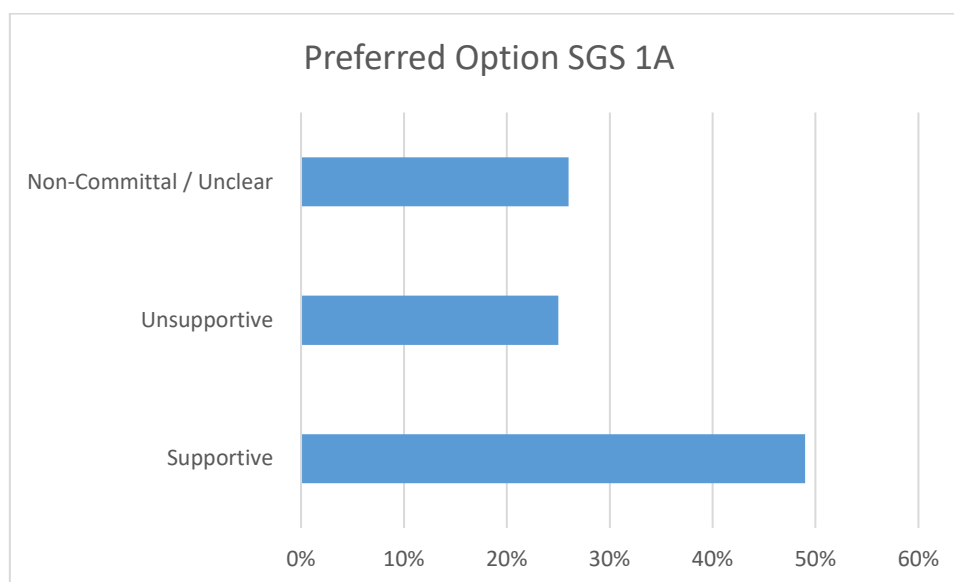
Taking account of the RDS Spatial Framework as well as a wide range of factors including the population of individual settlements and their hinterlands; and their function, including the community services and facilities they provide; the preferred approach proposed that the Borough's existing Settlement Hierarchy (comprising the 4 tiers of Hubs, Local Towns, Villages and Small Settlements) would be retained with the following changes:

- 2 Small Settlements re-classified upwards to Villages (Derrymacash and Scotch Street)
- 1 Village re-classified downwards to a Small Settlement (Derrylee)
- 2 new Small Settlements at Pier / Byrnes Rampart, Craigavon and Whitehall Road, Aghagallon
- 1 additional second Small Settlement node at Derryadd, Craigavon

Key Issue Response Rate: 26%

53 of the 201 representations received made comments in respect of Key Issue SGS 1 (Defining a Settlement Hierarchy).

- 49% of the responses were generally supportive of the preferred approach;
- 25% of the responses were unsupportive of the preferred approach; and
- 26% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SGS 1

Almost half of the respondents (49% / 26 No.) who submitted comments in respect of SGS 1 were supportive of the preferred approach. Some of the comments that were received in respect of SGS 1A are detailed below.

- The continued recognition of Portadown as part of a main hub (Craigavon Urban Area) acknowledges the contribution that the Craigavon Urban Area makes towards providing employment and services for the Borough (POP ref 136).
- The preferred approach SGS 1A and the 4-tier approach is logical. To be sustainable, sufficient land must be provided at a variety of locations across the Borough, and this must be considered in conjunction with the existing hierarchies (POP ref 148).
- The creation of new small settlements (or nodes) at Pier/ Byrnes Rampart, Whitehall Road and Derryadd should offer the potential to reduce rural sprawl and one-off housing in these areas (POP ref 174).
- It is important to ensure that the sustainability of existing rural communities is addressed through the provision of housing, so to sustain existing services in the settlements (POP ref 139).
- The preferred settlement hierarchy, subject to provisions, will secure the sustainability of villages and rural communities (POP ref 141).

One of the respondents welcomed Armagh remaining as a Hub, acknowledging that it is consistent with the RDS. However, in order for it to benefit from its strategic position, the respondent suggested that Armagh requires the allocation of additional housing lands and consolidation and rationalisation of the existing industrial land supply (POP ref 140).

Critique of the preferred approach to Key Issue SGS 1

A quarter of respondents (25% / 13 No.) who submitted comments in respect of SGS 1 did not support the preferred approach. Some of the accompanying comments and suggestions that were received are detailed below.

- Some of the small settlements should not be classed as separate from the Hub they are located next to, for example Edenaveys should be part of Armagh etc. Encouraging people to think they live in a larger settlement would foster civic pride and reduce isolation (POP ref 004).
- In order to ensure equal and sustainable growth across the Borough, consideration should be given to establishing (at least) one Local Town in either the former Craigavon (or part Dungannon) Council Areas (POP ref 070).
- An imbalance within the settlement structure is evident, particularly in relation to Local Towns. The LDP could identify villages with potential to grow to local towns thereby providing a more sustainable general settlement hierarchy such as Tamnamore (including Clonmore and Derrylee), Charlemont (including Collegeland and Blackwatertown) and Middletown (including St Marys terrace) (POP ref 83).

Some of the representations that were received suggested amendments to the structure of the proposed Settlement Hierarchy. One respondent suggested that the introduction of a 5th tier would allow for greater balance in the order of small – medium sized settlements that presently fall within the villages and small settlement categories, based upon the variety and degree of services that they provide (POP ref 128). Another respondent considered that the introduction of a 5th tier would help to promote and sustain a range of services that help strengthen the settlements and surrounding rural areas, and lead to renewed sustainable growth within settlements over single houses in the countryside (POP ref 185).

A number of the representations disagreed with the classifications presented within the proposed settlement hierarchy, and made suggested amendments including:

- The village of Waringstown should be re-classified as a local town (POP ref 012)
- The small settlement of Derryhale should be re-classified as a Village (POP ref 132)
- The rural areas of Ballymacnab, Cladymore, Derrynoose, Madden, Tassagh and Collegelands should be upgraded to village status (POP ref 147).
- Dromore should be moved to an additional tier above Local Towns as separate 'Large Town' and recognised as being different to the other five due to its size, strategic location and potential for further growth (POP ref 110).

In addition, there were several non-committal responses (14 No.), that did not offer a specific opinion on the preferred approach, but made suggestions or sought clarification in respect of SGS 1:

- The candidate small settlements have not been subject to a formal settlement evaluation methodology like existing settlements. For consistency these should be evaluated using the same methodology to help identify key issues which may affect the potential to expand, such as infrastructure (POP ref 113).
- A sustainable approach to further development will be important to ensure that growth does not exceed the capacity of the environment or the essential infrastructure expected for modern living (POP ref 135).

One of the respondents queried how the issue of further development within the Ramsar site would be addressed, in combination with the proposed new settlements (Derryadd, Pier/ Byrnes Rampart and Whitehall Road) in terms of the impact on biodiversity and landscape (POP ref 082).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to the SGS 1 'Defining a Settlement Hierarchy.'

Following discussion of the proposed Settlement Hierarchy and the process of settlement classification it was suggested that the Council should:

- Re-consider Lisnagade / Ballyvarley (between Banbridge and Scarva) as a new small settlement;
- Re-consider upgrading Annaghmore (Moss Road) from a Small Settlement to a Village; and
- Consider the potential to amalgamate the existing nodes of Derryhale Small Settlement.

Our comments

It is considered that the proposed settlement hierarchy is based upon a sound analysis of the settlements within the Borough, as outlined in the Strategic Settlement Evaluation. The location of settlements, how they function and their relationship with adjacent settlements is a consideration of the settlement appraisal and should be considered alongside issues such as identity and historical patterns of development.

Further consideration will be given to all constructive criticism and suggested improvements in the context of regional policy.

An additional LDP Workshop was held with the Elected Members on Thursday 10th October 2019 to further consider the POP representations detailed above, and to discuss Members comments and opinions in respect of the proposed Settlement Hierarchy. Members were content with officers recommendation that the proposed Settlement Hierarchy, as presented in the POP, should be brought forward to draft Plan Strategy.

Preferred Option, for Key Issue SGS 2 (Allocating housing)

Option SGS 2A

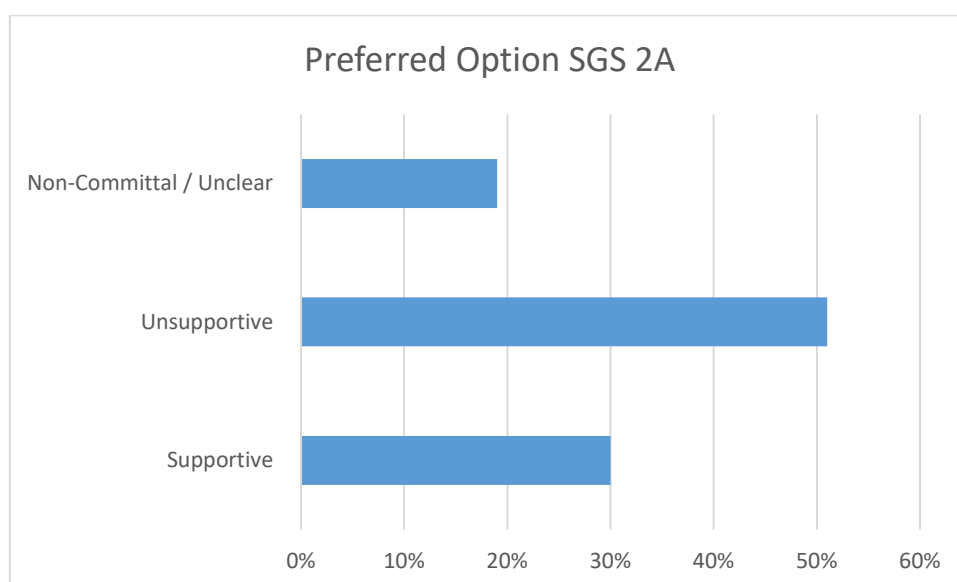
Focus housing growth on the Hubs whilst sustaining rural communities to reflect regional direction.

The preferred approach to the Borough's Housing Allocation Strategy was based on the existing distribution of housing across the Settlement Hierarchy (as recorded in the 2011 Census) but with a slight adjustment in favour of the 3 main Tier 1 Hubs (upwards by 1% to 52%) to further support the objectives of the Regional Development Strategy (RDS) for strong growth in larger urban areas. It was envisaged that this would help to grow our existing main population centres where infrastructure, services and employment opportunities are already focused.

Key Issue Response Rate: 34%

69 of the 201 representations received made comments in respect of Key Issue SGS 2 (Allocating Housing).

- 30% of the responses were generally supportive of the preferred approach;
- 51% of the responses were unsupportive of the preferred approach; and
- 19% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SGS 2

There was a low level of support for the preferred approach to Key Issue SGS 2, with only 30% (21 No.) of respondents supportive of SGS 2A. Many of the respondents who were supportive of the preferred approach did not substantiate or justify their support. However, some of the comments that were received in respect of SGS 2 are detailed below.

- The preferred approach is logical and directs growth in the main hubs. Levels of growth across the Borough should be commensurate with their place in the settlement hierarchy (POP ref 148).
- Housing growth should be directed to the hubs to protect their function, but with some allocation to small settlements and rural areas. Allocating housing to rural areas will help to sustain and support rural communities and assist their sustainability (POP ref 174).

- The drive to focus housing growth on the places with better infrastructure and access to services whilst not ignoring the smaller settlements of the wider rural area is welcomed (POP ref 079).

One of the respondents considered that the preferred approach, as a broad-brush methodology, has significant merit however suggested that appropriate caveats must be built in to ensure that planning pinch points, such as affordable housing, can be examined specifically and sensitively (POP ref 012).

Although in agreement that the preferred approach to focus housing development in the hubs aligns with RDS guidance, one respondent highlighted that housing numbers can be delivered at variance to the HGI and still meet the tests of Plan soundness (POP ref 118).

Critique of the preferred approach to Key Issue SGS 2

Over half of the responses that referred to Key Issue SGS 2 were unsupportive of the preferred approach (51% / 35 No.). The following illustrates the wide range of comments that were received in respect of this Key Issue:

- The RDS housing Evaluation frameworks is a very flexible assessment of capacity to assist each borough, but it is not subtle enough to deal with the idiosyncrasies of each settlement and on this basis the Council should review the housing allocation (POP ref 103).
- Robust evidence to justify the housing requirement has not been provided, the evidence underpinning the POP is out of date in particular the changing economic context (POP ref 112).
- The LDP must address current and future residential needs through ensuring vacant buildings, unused, underused land, backland and brownfield land are prioritised to provide sufficient suitable land to meet future requirements (POP ref 147).
- The high percentage for the Hubs can only lead to further infrastructure issues due to the needs for upgrading of existing drainage system, problems with flooding and increased traffic flows (POP ref 173).

A significant number of representations queried the housing growth (HGI) figure and made a number of recommendations on how it should be adjusted, including:

- Projecting the social housing need figure to cover the plan period;
- Basing the overall housing figure on a longer period of growth; and
- Allowing for a margin of unexpected growth from cross boundary relationships.

Based on their recommendations of how it may be adjusted, several respondents suggested an alternative HGI figure (including but not limited to POP refs 068, 069, 073, 074, 075).

One of the respondents drew attention to the fact that the HGI is based in the 2012 HGI figures and highlighted that they were not subject to public scrutiny, which therefore offered a lower and more conservative figure taking account of the abnormal period of recession / slow growth. On this basis the respondent suggested that the housing allocation should be uplifted in line with the original HGI figures outlined in the RDS 2035 (POP ref 128).

Another respondent highlighted that the HGI figure is for guidance and is not a cap or target and therefore councils can allocate more than the stated figure if this can be justified, given the particular circumstances of the individual council. The respondent considered that the specific circumstances of the council and the evidential basis for the HGI were not considered, or the need to ensure a 5-year land supply to the end of the LDP period (POP ref 110).

A number of the respondents queried the preferred allocation of housing detailed in SGS 2A, many of which suggested alternative allocations, including:

- A greater percentage of the housing allocation should be apportioned to larger villages (including Donaghcloney) in order to sustain growth (POP ref 065).
- The preferred approach retains too much focus on small settlements and the rural area to the detriment of the larger settlements where population increase can be sustained, highlighted by the small settlements and rural area receiving 25% and villages and local towns a combined 23% of the housing allocation (POP ref 110).
- The housing allocation should be more heavily weighted towards the growth of Local Towns, which represent a more sustainable location for growth than widely dispersed settlement in smaller settlements and in the countryside (POP ref 098).
- Allocation should be increased to both the hubs and local towns, where the most sustainable infrastructure is located. Given its size, strategic location and potential for further growth, the CUA should receive the largest share of the allocation for hubs (POP ref 146).
- The allocation to Local Towns is too low, while the allocation to Villages and Small Settlements and the Rural Area is too high. The Plan should encourage more growth in the larger settlements, especially those with good service provision and quality transportation links (POP ref 180).

In addition, there were several non-committal responses that did not offer a specific opinion on the preferred approach, but highlighted areas in the Borough where there was demand for housing.

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to SGS 2 'Allocating Housing.' The Members discussed factors that may have led to the high level of unsupportive responses, which included critique of the methodology and evidence base, and also the significant number of representations that had a site-specific interest.

The allocation of housing land across the Borough was also discussed and it was acknowledged that this will be a challenge for the Council moving forward given the quantity of zoned and committed land, particularly in the Craigavon Area Plan 2010. Members also agreed that the Council should continue to take account of wastewater / sewage capacity within the Borough, including consulting with Northern Ireland Water (NIW) to confirm updated position on Wastewater Treatment Works (WwTWs).

Our comments

The high level of public response in respect of this issue is welcomed.

The various comments / feedback will be further considered in advance of the Draft Plan Strategy.

The Council will continue to develop and review its evidence base throughout the LDP process., This will include, inter alia, HGI's, the RDS Housing Evaluation Framework, consideration of existing commitments and completions, and Urban Capacity Studies, along with on-going updates to the Housing Monitor to inform an assessment of the remaining housing potential across the Borough. In establishing the distribution of housing growth across settlements the Council will take account a range of factors, including the size, role, constraints of accessibility and function of each settlement along with available services and facilities.

Preferred Option, for Key Issue SGS 3 (Allocating economic development lands)

Option SGS 3A

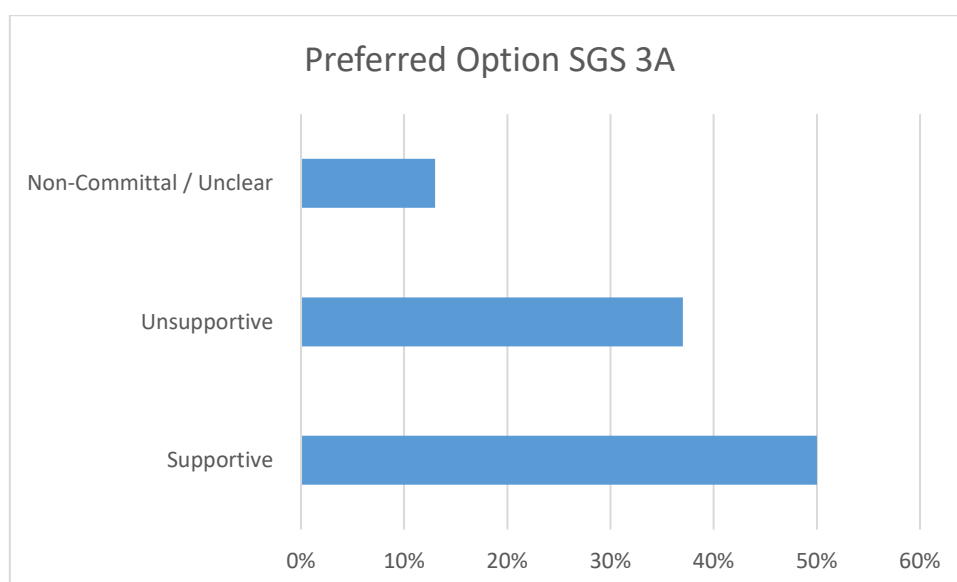
Apportion economic development lands in relation to former Council populations and in addition reflect Craigavon's sub-regional function.

The preferred approach allocated the 245ha of economic development lands estimated to be needed during the LDP period, up to 2030, based on the distribution of population across the Borough's former council areas at the time of the 2011 Census.

Key Issue Response Rate: 19%

38 of the 201 representations received made comments in respect of Key Issue SGS 3 (Allocating economic development lands).

- 50% of the responses were generally supportive of the preferred approach;
- 37% of the responses were unsupportive of the preferred approach; and
- 13% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SGS 3

Half of the respondents (50% / 19 No.) who submitted comments in respect of SGS 3 were supportive of the preferred approach. Some of the comments and suggestions that were received in respect of SGS 3A are detailed below.

- The provision of sufficient and suitable land to retain existing businesses and attract new investment is critical, including facilitating economic development of an appropriate nature, scale and location in the countryside, including within the traditional primary sectors of forestry, agriculture and mining (POP ref 062).
- An adequate supply of land is required to facilitate sustainable economic growth; this land should be in the right places with larger populations and beside good infrastructure (road and rail) (POP ref 079).

- There is an existing generous supply of industrial land within the former Craigavon area. This sufficient supply supports the idea that some of these sites could be used for other forms of development (POP ref 115).
- It is important that barriers to accessing employment should be removed, in other to promote prosperity for local communities. Therefore accessibility, particularly by means other than the private car, should be a key consideration in the designation of employment land (POP ref 174).

One of the respondents considered that a major factor in the future success of the economic development lands policies will be ensuring that the right land is identified, and unsuitable lands are released for alternative purposes. The respondent suggested that lands that are retained for employment uses should be afforded greater flexibility in the types of the uses that they can be put to in order to keep abreast of changes in the sector and types of job opportunities coming forward (POP ref 185).

One of the respondents highlighted that inward investment should not be prioritised over the investment of existing businesses and to be sustainable, sufficient land must be provided for economic development at variety of locations across the Borough (POP ref 148).

Critique of the preferred approach to Key Issue SGS 3

A relatively high number of respondents (37% / 14 No.) were unsupportive of the preferred approach to SGS 3. Some of the comments and suggestions that were received are detailed below.

- Economic development should be up to the free market and free from interference from politicians and organisations such as the Council, with minimum restrictions placed on people wishing to start a new business (POP ref 004).
- The allocation of economic development land is too much unless brownfield sites are used (POP ref 006).
- The approach fails to place emphasis on sustainability, the commitment to explore brownfield sites or the possibility to retain / reuse vacant or under used lands (POP ref 135).
- The various inter-relationships between different aspects of the POP, in particular the housing and employment policies, should be further considered (POP ref 121).
- An economic growth strategy for the countryside should be established, which will also require cognisance of the natural environment and acknowledgement that sensitive areas should be avoided (POP ref 135).
- Armagh requires a commitment to a robust job creation strategy that factors in economic development outside of just Banbridge and Craigavon. Armagh must see its equal share of economic investment as this area cannot be sustained on tourism alone (POP ref 147).

One of the respondents considered that the focus on labour supply growth as opposed to labour demand based scenarios of growth should be reconsidered and that there is a need to consider historic growth levels, quantify growth potential and consider specific projects and investment, in addition to opportunities presented by growth sectors (POP ref 124).

Another of the respondents highlighted that the split of economic development land should not be detrimental to potential growth in sub regions or local towns, it has to allow for the development of industry and services to support growth in local towns in the future (POP ref 176).

In addition, there were a small number of non-committal responses (5 No.), that did not offer a specific opinion on the preferred approach, but made recommendations in respect of SGS 3, including:

- It is important to have adequate infrastructure to cope with discharges/emissions into the environment and the choice of appropriate sites which avoid potential for negative impact on biodiversity through loss of, or disturbance to nature rich sites or through the fragmentation of ecological networks (POP ref 082).
- The Borough is a major regional area of employment in the north, and it is important that this is retained and built on, particularly in relation to its position on the north / south and east / west economic corridors (POP ref 125).
- Armagh requires consolidation and rationalisation of the existing industrial land supply (POP ref 140).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to SGS 3 'Allocating Economic Development Land.' The review of economic development land was discussed by Members, and it was considered that addressing the issues of location, deliverability, infrastructure and accessibility would be vital to achieving the Councils ambitions for economic development of the Borough.

Our comments

The preferred approach aligns with RDS guidance to direct employment lands to the Hubs whilst acknowledging Craigavon's strong sub-regional function with an existing strong manufacturing and industrial base.

As the LDP progresses the evidence base will continue to be reviewed and developed in response to new / updated information. This is vital to ensure that the LDP is founded on the principles of soundness, and an updated evidence base will ensure that any particular issues facing the Borough are identified so that they may be appropriately addressed through the LDP.

Officers acknowledge the methodology used is an estimate of the required economic development lands to 2030. However, this is considered consistent with the RDS 2035 direction to ensure that there is an "adequate supply of lands" and the SPPS which requires an "ample supply, range and location of lands to promote flexibility".

6 Social Theme

The POP identified a total of 7 Key Issues under the Social Theme; these were derived from the POPs Strategic Social Objectives which were developed taking account of regional policy and our evidence base.

This section deals with the following Key Issues:

Urban Housing

Key Issue SOC 1: Supporting quality sustainable urban housing and balanced communities

Rural Housing

Key Issue SOC 2: Supporting sustainable rural housing

Design and Place- Making

Key Issue SOC 3: Supporting good design and positive place-making

Open Space, Sport and Outdoor Recreation

Key Issue SOC 4: Protecting open space

Key Issue SOC 5: Facilitating open space / play provision in new largescale residential developments

Community and Cultural Facilities

Key Issue SOC 6: Facilitating community and cultural facilities to meet the needs of the Borough

Developer Contributions

Key Issue SOC 7: Facilitating development through Developer Contributions

Preferred Option, for Key Issue SOC 1 (Supporting quality sustainable urban housing and balanced communities)

Option SOC 1A

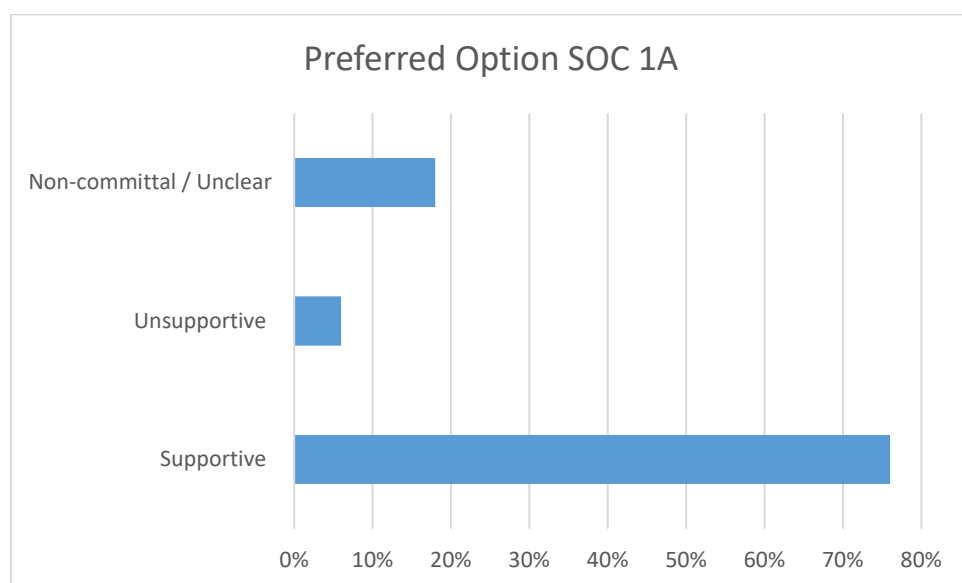
An approach to new residential development in settlements in line with existing policies, tailored to reflect regional direction and to meet local circumstances

The preferred approach involved bringing forward a similar set of policies as contained in the existing suite of operational policy but with some adjustment to reflect the Council's wider approach to the urban area under other Key Issues and to build on the regional direction contained in the SPPS to best reflect local circumstances, where appropriate.

Key Issue Response Rate: 17%

34 of the 201 representations received made comments in respect of Key Issue SOC 1 (Supporting quality sustainable urban housing and balanced communities).

- 76% of the responses were generally supportive of the preferred approach;
- 6% of the responses were unsupportive of the preferred approach; and
- 18% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SOC 1

There was a relatively high level of support (76%) for the preferred approach to SOC 1. Some of the comments and suggestions that were made in respect of SOC 1A are detailed below.

- Emphasis should be placed on the importance of integrating development proposals to the local areas they are proposed for, in a more rigorous approach than in PPS 7 or DCAN 8 so to minimise jarring interfaces between areas (POP ref 064).
- Design quality should be reflective of the character of the area and be flexible (POP ref 119).
- There is strong demand for more social and affordable housing across the Borough and in particular in areas of high social deprivation, both urban and rural. Social and Affordable Housing

must be developed in a manner which is sustainable and provides community facilities and infrastructure (POP ref 125).

- A mixture of new homes in accessible locations around the Borough will encourage and assist with future growth. Account will need to be taken of the tenure and location of housing allowing for fluctuations in age groups and future demands (POP ref 148).
- Housing development should be consolidated wherever possible, within settlements and villages, to promote regeneration, enhance vibrancy, and to better sustain commercial and community amenities and facilities, with increased access to public transport (POP ref 174).

One respondent, whilst supportive of the preferred approach, considered that some aspects could be strengthened to truly further sustainable development and incorporate climate change adaptation and resilience building (POP ref 135).

Critique of the preferred approach to Key Issue SOC 1

Only two (6%) of the responses to the preferred approach were unsupportive. Some of the comments that were made in respect of SOC 1 included:

- New policy should specifically state that any new development in villages and small settlements should be very low density. Appropriate density should be based on the historic character of the settlement, with less reference to any modern housing developments found within a particular settlement (POP ref 180).
- The RDS and the SPPS are clear on their requirements for "Adequate and Available Housing" and as such the LDP should quantify the terms "Adequate" and "Available" (POP ref 188).

A number of the non-committal responses also offered constructive advice in respect of Key Issue SOC 1. Such comments included:

- The LDP must address current and future residential needs through ensuring that vacant buildings, unused, underused land, back land and brownfield land are prioritised to provide sufficient suitable land to meet future requirements. New residential development must be of the type, size, tenure and mix necessary to meet household sizes and range of incomes (POP ref 147).
- There is an opportunity to incorporate blue and green infrastructure with potential wins for biodiversity in well planned schemes (POP ref 082).
- The LDP could provide opportunities for the historic environment including the promotion of heritage led regeneration and adaptive reuse of vacant buildings (POP ref 080).
- The most up to date urban capacity figure indicates that there is sufficient land within settlement boundaries to meet identified housing need and highlighted that in order to be sound, the strategy, policies and allocations need to be realistic and appropriate having considered relevant alternatives and are founded on robust evidence (POP ref 113).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to SOC 1 'Supporting quality sustainable urban housing and balanced communities', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. A number of planning policies are relevant to this Key Issue, including:

- Planning Policy Statement (PPS) 7: Quality Residential Environment;
- Addendum to PPS 7 -Planning Policy Statement (APPS) 7: Safeguarding the Character of Residential Areas;
- Addendum to PPS 7- Planning Policy Statement (APPS) 7: Residential Extensions and Alterations;
- Planning Policy Statement (PPS) 12: Housing in Settlements; and
- Planning Policy Statement (PPS) 12 Policy HS 3 (Amended) Travellers Accommodation.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Residential Developments/Extensions in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include: -

- Reducing the threshold for Master Plans on major residential developments.
- Use of permeable paving within residential areas.
- Stronger defined criteria for Sustainable Movement Patterns/Active Travel/Greenways. (Supported by Supplementary Planning Guidance, where appropriate)
- Encouraging a mix of house types, across tenures, and sizes.

A more detailed review of the above policies (and associated addendums) will be carried out in advance of the Plan Strategy.

Also note that the following are also relevant policy considerations in respect of this Key Issue:

- Planning Policy Statement 8 (PPS 8): Open Space, Sport & Recreation (Policy OS 2 sets out the criteria for the provision of integral open space and equipped children's play provision in new residential development); and
- The Planning Strategy for Rural Northern Ireland (PSRNI) Policy DES 2 (Townscape) and Policy DES 10 (Landscaping).

A more detailed review of these policies will be carried out in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Support for the preferred option is welcomed. Council would agree that housing density should consider the character of the settlement and the character/density of development in the locality.

The Council will take account of regional policy direction in order to establish the quantity of housing to be provided within the Borough. This will include a range of factors including: HGI, Urban Capacity Studies, windfall allowance, Housing Needs Assessment and potential committed housing supply to determine the overall housing requirement.

The Council will carry out an annual report on housing supply to help ensure that an adequate and available housing supply is maintained throughout the Plan period.

Preferred Option, for Key Issue SOC 2 (Supporting sustainable rural housing)

Option SOC 2A

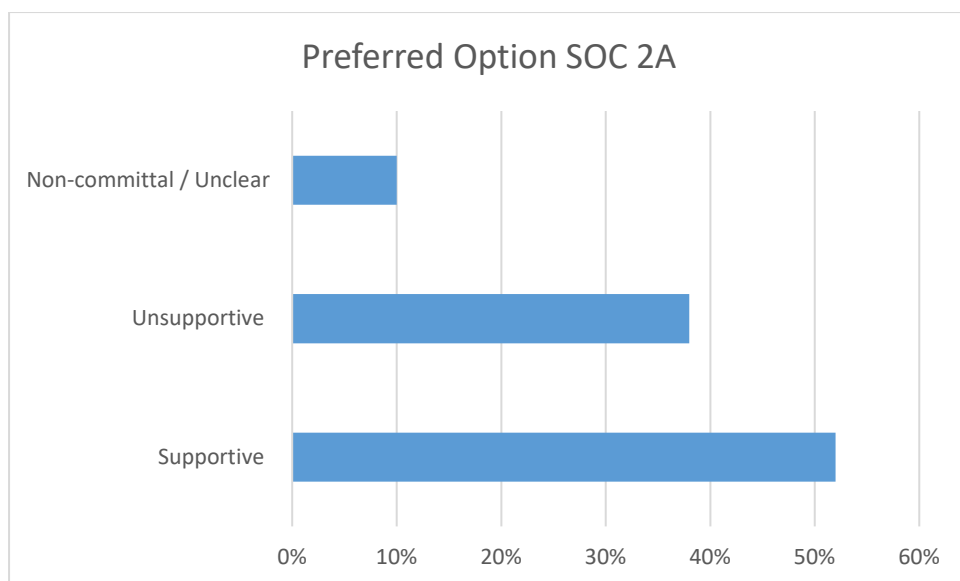
An approach to rural housing in line with existing policies and further regional direction, tailored to meet local circumstances.

The preferred approach recommended bringing forward a similar set of operational policies as contained in the existing PPS 21 (Sustainable Development in the Countryside) and the Addendum to PPS 7 (Residential Extensions and Alterations), but with some adjustment to reflect the Council's wider approach to the rural area under other key issues (e.g. landscape designations and design) and to build on the regional direction contained in the SPPS to best reflect local circumstances, where appropriate.

Key Issue Response Rate: 14%

29 of the 201 representations received made comments in respect of Key Issue SOC 2 (Supporting Sustainable rural housing).

- 52% of the responses were generally supportive of the preferred approach;
- 38% of the responses were unsupportive of the preferred approach; and
- 10% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SOC 2

Over half of the respondents (15 No.) who submitted comments in respect of SOC 2 were supportive of the preferred approach. Some of the comments and suggestions that were received in respect of SOC 2A are detailed below.

- The preferred approach is consistent with the SPPS and will be tailored to local need (POP ref 079).

- A more locally tailored approach to areas designated or recognised for their biodiversity value or acknowledged for their landscape quality would complement the ENV suite of policies (POP ref 082).
- Any approach that is in line with existing rural policies as set out in PPS 21 is welcomed. Opportunities provided by the SPPS provide the appropriate balance between managing growth to achieve sustainable patterns of growth and facilitate development to support a vibrant rural community and economy (POP ref 113).
- A clear definition of 'infill development within a small gap site in an otherwise substantial and continuously built frontage' is welcomed. The SPPS does not go far enough in providing more opportunities to sustain rural communities, therefore a more flexible approach needs to be taken within the existing criteria (POP ref 147).

One of the respondents, whilst supportive of the preferred approach to rural housing, highlighted that consideration must be given to other potential forms of land use, such as minerals development, so to ensure that housing development does not sterilise an important mineral or aggregate reserves in the countryside (POP ref 062).

Critique of the preferred approach to Key Issue SOC 2

A relatively high level (38% / 11 No.) of the respondents did not support the preferred approach to SOC 2. Some of the comments and suggestions that were received in respect of SOC 2A are detailed below.

- The future approach should be focused on sustaining the established small settlements through the provision of housing within settlements. This would better support the services and facilities within small settlements (POP ref 121).
- The preferred approach does not recognise and have regard to the disproportionate growth in the countryside as noted in the RDS.... Environmental considerations should be considered in the location, siting and design of dwellings in the countryside and that policy should recognise the environmental value of the countryside (POP ref 135).
- Relaxation of policy which departs from that of the SPPS, will allow too much flexibility and facilitate an increased number of one-off dwellings in the open countryside. The LDP should aim to limit the growth of dispersed, single dwellings in the countryside (POP ref 174).
- The approach goes against the prevailing principles of sustainable development as the preferred approach suggests that the majority of rural housing will be provided by dwellings in the countryside (POP refs 141 and 143).
- In the context of fewer and larger farm businesses there is no need for significant new volumes of housing in the countryside to meet real need. The needs of most farming families can be met using existing stock, replacements and conversions (POP ref 180).

One of the respondents, although welcoming the Councils recognition that housing should be provided to ensure the sustainability of rural communities, considered that insufficient evidence had been provided to support the preferred approach to rural housing (POP ref 139).

One of the responses stated that they were supportive of SOC 2B, one of the alternative approaches to Key Issue SOC 2, which suggested an approach to rural housing in line with existing policies and further regional direction. The respondent expressed concern that relaxation of policy which departs from that of the SPPS, would allow too much flexibility and facilitate an increased number of one-off dwellings in the open countryside. Instead, the respondent suggested that the LDP should aim to limit the growth of dispersed, single dwellings in the countryside (POP ref 174).

Two of the responses stated that they were supportive of SOC 2C, one of the alternative approaches to Key Issue SOC 2, which suggested a more restrictive approach to rural housing than existing (POP refs 001 and 135). Another respondent stated that SOC 2C is 'relatively close' to being the best approach to rural housing, but the policy needs to be more restrictive and promote more sustainable patterns of urban living in settlements that provide a reasonable variety of services and community facilities (POP ref 180).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to SOC 2 'Supporting sustainable rural housing', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relevant to this Key Issue is Planning Policy Statement (PPS) 21: Sustainable Development in the Countryside.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to development in the Countryside in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include providing clarification and addressing some inconsistencies between the current policies in PPS 21.

A more detailed review of PPS 21 will be carried out in advance of the Plan Strategy.

Also note that the Addendum to PPS 7, Planning Policy Statement (APPS) 7: Residential Extensions and Alterations is a relevant policy consideration in respect of this Key Issue as it provides an additional planning policy for achieving quality in relation to proposals for residential extensions and alterations, both urban and rural. A more detailed review of PPS 7 will be carried out in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Support for the preferred option is welcomed.

The Council will undertake further evidence gathering to determine any capacity for policy change. Any changes if appropriate will remain compliant with the balanced approach of the SPPS between protecting the environment and our landscapes, including those considered to be sensitive or of merit and enabling appropriate development in the countryside in order to support rural communities.

Preferred Option, for Key Issue SOC 3 (Supporting good design and positive place-making)

Option SOC 3A

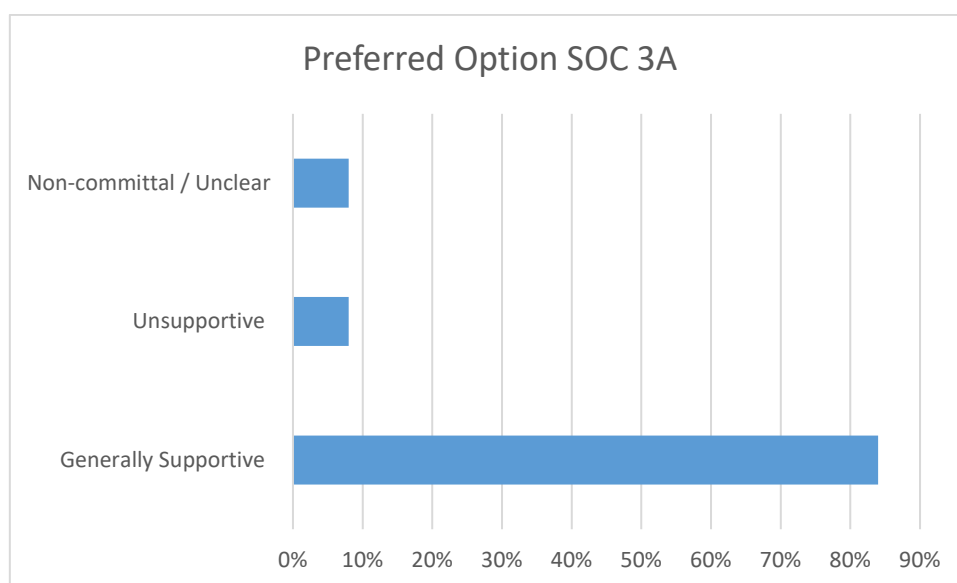
Support good design and positive place-making in both development and advertisement proposals through criteria-based policy, with provision for additional design criteria and supporting guidance for certain identified areas of acknowledged importance/value or types of development where appropriate.

The preferred approach recommended bringing forward a general policy for design and placemaking across the Borough for all types of development and advertisement but allowing for additional criteria and supporting guidance for particular areas of acknowledged importance or that warrant an additional level of control or care in design terms.

Key Issue Response Rate: 18%

36 of the 201 representations received made comments in respect of Key Issue SOC 3 (Supporting good design and positive place-making).

- 84% of the responses were generally supportive of the preferred approach;
- 8% of the responses were unsupportive of the preferred approach; and
- 8% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SOC 3

There was a high level of support for the preferred approach to Key Issue SOC 3, with 84% (30 No.) of the responses supportive of SOC 3A. Some of the comments and suggestions that were received in respect of SOC 3A are detailed below.

- The acknowledgement of the use of heritage assets for positive place making is welcomed. Any policy framework for design and place-making should have the historic environment at its core, which has an important role in inclusivity and cohesion (POP ref 080).

- The recognition that the rural area may require more detailed criteria to support good design, providing a consistent overarching framework, is welcomed (POP ref 102).
- The LDP should encourage local distinctiveness and design innovation. Particular architectural styles should not be imposed that would lead to a 'rigid and formulaic approach' to decision making (POP ref 112).
- A greater emphasis on place making and design will result in a high-quality built environment for all. Good design principles and solutions should be appropriate to the setting and characteristics of the area (POP ref 148).
- Design criteria should be used to ensure a high standard of design and layout across all development, including advertisement proposals (POP ref 123).
- The local aggregates industry, employing local people and using local materials will provide the building materials to facilitate world class design and place making (POP ref 062).
- It would be beneficial to have a council wide policy, as there are no specific design policies at present (POP ref 147).
- Good design must adopt an approach which is both sustainable and directly beneficial to the local economy. This must promote the use of local resources, both in terms of local skills/human resources and construction materials (POP ref 177).

One of the respondents, whilst supportive of the preferred approach, considered that the approach to design and place-making could be more ambitious. The respondent considered that the LDP's General criteria should address the long-term sustainability of development by promoting future proofing, energy efficiency, the re-use of material and measures to enhance biodiversity and reduce surface run-off (POP ref 135).

Another of the respondents highlighted that a place making approach for development will enhance design proposals, provide a sense of place, attract investment and improve well-being. The respondent suggested that successful place making requires a holistic approach, which looks at the overall functions of a place and relationships with the other buildings and the environment. Furthermore, the respondent considered that community involvement is also an important element of place making and local people should therefore be given the opportunity to shape the development of a place to ensure that it meets community needs (POP ref 174).

Critique of the preferred approach to Key Issue SOC 3

Only 8% (3 No.) of the respondents stated that they were unsupportive of the preferred approach to SOC 3. Some of the accompanying comments and suggestions that were received in respect of SOC 3A are detailed below.

- Conservation Areas should be limited as they are often used as a way to block development and keep communities living in the past effectively. Urban areas should be well maintained however a large policy document filled with jargon is unlikely to bring about any meaningful change (POP ref 004).
- There is a need to continually adapt and remodel buildings to meet modern challenges in terms of a buildings' viability and its environmental sustainability. Current policy (PPS 6) imposes unreasonable restrictions which hamper redevelopment opportunities and undermine the urban quality, it has produced neglected buildings and streetscapes and has enforced the continence of unsustainable buildings. A less restrictive approach needs to be taken to allow appropriate redevelopment of buildings within ATCs, Conservation Areas and other designated places and buildings (POP ref 180).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to SOC 3 'Supporting good design and positive place making', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. There are a number of planning policies that are relevant to this Key Issue.

One of the current operational policies relevant to this Key Issue is Policy DES 2 (Townscape) of The Planning Strategy for Rural Northern Ireland (PSRNI). The recommendation made by the Council in the Preliminary Policy Review in respect of townscape was that the LDP should bring forward additional design criteria and supporting guidance for certain identified areas.

Another of the current operational policies relevant to this Key Issue is Planning Policy Statement (PPS) 17: Control of Outdoor Advertisements. The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Advertising in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include additional design criteria for advertisements. A more detailed review of PPS 17 will be carried out in advance of the Plan Strategy.

The preliminary policy review recommended that the LDP should bring forward an approach to design in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Therefore, the review suggested that supplementary planning guidance (including Design Guides (DCAN 8- Housing in existing Urban Areas), Living Places and Building on Tradition - A Sustainable Design Guide for the Northern Ireland Countryside) would be reviewed as needs be, in order to reflect the Council's wider policies.

Also note that the following are also relevant policy considerations in respect of design and placemaking:

- Planning Policy Statement 6 (PPS 6): Planning, Archaeology and the Built Heritage (primarily under Policies BH 8, BH 9, BH 11 and BH 12) and also its accompanying addendum;
- Planning Policy Statement 7 (PPS 7): Quality Residential Environments and its accompanying addendum;
- Planning Policy Statement 8 (PPS 8): Open Space, Sport & Recreation (Policy OS 2)
- Planning Policy Statement 12 (PPS 12): Housing in Settlements (4 Planning Control Principles, in addition to Policies HS 1-4); and
- Planning Policy Statement 21 (PPS 21): Development in the Countryside (Policy CTY 10).

A more detailed review of these policies will be carried out in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Support for the preferred option is welcomed.

The link between heritage assets / historic environment and design and place making is noted, and will be further explored as the approach to design and place making is developed

Any new policy will comply with the SPPS in that the LDP will encourage local distinctiveness and quality design. The preferred approach also allows for additional criteria and guidance to be used to address the particular design requirements of certain types of development and to provide the necessary control and attention to detail within recognised local areas of heritage, townscape and landscape character.

Preferred Option, for Key Issue SOC 4 (Protecting Open Space)

Option SOC 4A

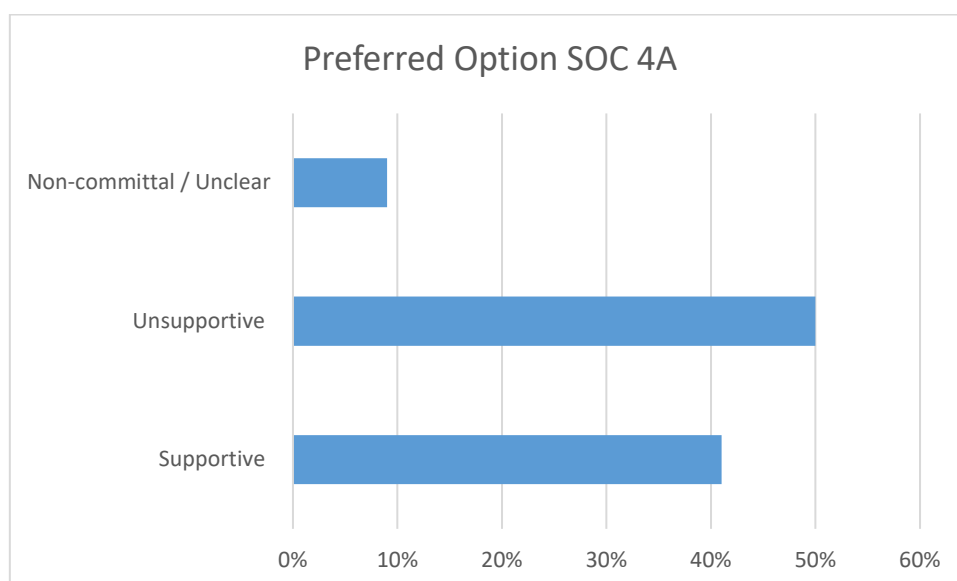
Protect existing open space (in addition to identifying and zoning land for new provision) in line with existing policy and regional direction, tailored to meet local circumstances.

The preferred approach recommended a review of open space in and around some of the long-established public housing estates (where there may be an overprovision of informal green space) so it may be re-evaluated to assess its continued suitability for protection or establish whether there is scope to consider more sustainable uses. However, the preferred approach clarified that beyond the limited identified areas for further appraisal, there would be a presumption against the loss of open space, existing or zoned, subject to a review when preparing the LDP Open Space Strategy.

Key Issue Response Rate: 22%

44 of the 201 representations received made comment in respect of Key Issue SOC 4 (Protecting Open Space).

- 41% of the responses were generally supportive of the preferred approach;
- 50% of the responses were unsupportive of the preferred approach; and
- 9% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SOC 4

There was a relatively low level of support for the preferred approach to Key Issue SOC 4, with only 41% (18 No.) of respondents supportive of SOC 4A. Many of the respondents that were supportive of the preferred approach did not substantiate or justify their support. However, some of the accompanying comments that were received in respect of SOC 4 are detailed below.

- Open space should be viewed as an asset and as a way of improving visual amenity. The protection and enhancement of existing open space and the provision of new open spaces promotes active and healthy lifestyles and the conservation of biodiversity (POP ref 148).

- There are circumstances where the selective redevelopment of portions of open space, particular within large estates, can deliver positive effects in terms of estate restricting, reductions in anti-social behaviour and meeting high levels of housing need (POP ref 174).

Critique of the preferred approach to Key Issue SOC 4

Half of the respondents (50% / 22 No.) were unsupportive of the preferred approach towards SOC 4. Some of the comments that were received are detailed below.

- The loss of open spaces within urban areas should be resisted. Just because an area is currently underused or difficult to manage should not be a justification for its loss. A new community approach to the management, ownership, connectivity and increased accessibility could serve in part to re-enabling these areas of open space to make a positive contribution to the local neighbourhood and biodiversity (POP ref 135).

A significant number of respondents (20 No.) stated that they were supportive of SOC 4B, an alternative approach to Key Issue SOC 4. SOC 4B suggested that the current approach is continued by protecting existing open space provision in line with existing policy (in addition to identifying and zoning land for new open space provision). However, no justification was provided to explain why SOC 4B was the preferred option for these respondents.

In addition, there were a small number of non-committal responses (4 No.), that did not offer a specific opinion on the preferred approach, but made recommendations or suggestions in respect of SOC 4:

- There are a number of existing underused open spaces in the borough around heritage assets, such as historic graveyards, historic route ways or abandoned railway lines. The LDP provides an opportunity to capture the potential of accessing these as distinct, peaceful places for the enjoyment and benefit of the local community (POP ref 080).
- The Council should actively promote and plan for the creation of a network of open spaces and green and blue infrastructure throughout all the settlements within the Plan area, forming linkages of wildlife corridors, pedestrian routes and cycleways, sitting and play areas and encouraging biodiversity through new tree and shrub planting, wet areas and ponds (POP ref 082).
- Loss of existing open space should only be appropriate where it is demonstrated that redevelopment would bring substantial community benefit that outweighs the loss of the open space; or where it is demonstrated that the loss of open space will have no significant detrimental impact (POP ref 113).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to SOC 4 'Protecting Open Space.' Members discussed how the re-evaluation of open space in and around long-established housing estates would be carried out to ensure that any decisions are transparent and justified.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this Key Issue is Planning Policy Statement (PPS) 8: Open Space, Sport & Recreation.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Open Space, Sport and Recreation in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include additional provision of equipped play areas on large residential schemes, including, potential for Multi-Use Games Areas (MUGAs).

A more detailed review of PPS 8 will be carried out in advance of the Plan Strategy.

Also note that the following are also relevant policy considerations in respect of open space:

- Planning Policy Statement 2 (PPS 2): Natural Heritage (provides operational policies for open spaces and recreation areas that are protected by international, national and local nature conservation designations);
- Planning Policy Statement 6 (PPS 6): Planning, Archaeology and the Built Heritage (relates to Local Landscape Policy Areas (LLPAs) and/or Historic Parks, Gardens and Demesnes); and
- Planning Policy Statement 7 (PPS 7): Quality Residential Environments- Policy QD 1 (Criterion c, relating to provision of public open space and landscaped areas).

A more detailed review of these policies will be carried out in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Comments made in relation to the preferred option are welcomed and will be further considered later in the LDP process at the relevant stage

Given the level of unsupportive representations the Council will further consider its approach to this key issue in advance of the draft Plan Strategy and within supporting evidence.

Preferred Option, for Key Issue SOC 5 (Facilitating open space / play provision in new largescale residential developments)

Option SOC 5A

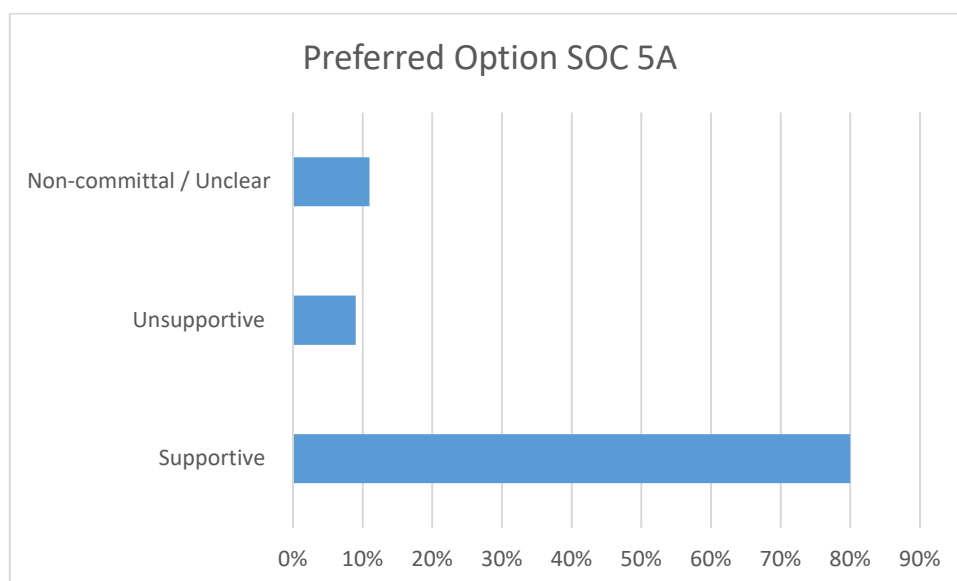
A locally tailored approach, with amendment to the existing criteria for play park provision in largescale residential developments to increase provision in larger schemes to more than one equipped play area (as currently required in existing policy), as well as to provide the option for Multi-Use Games Areas (MUGAs), where appropriate, unless otherwise specified in LDP Key Site Requirements.

The preferred approach recommended carrying forward the existing policy led approach to on-site play park provision in residential developments, as set out in Policy OS 2 (PPS 8) but tailored to better meet specific local needs.

Key Issue Response Rate: 17%

35 of the 201 representations received made comment in respect of Key Issue SOC 5 (Facilitating open space / play provision in new largescale residential development).

- 80% of the responses were generally supportive of the preferred approach;
- 9% of the responses were unsupportive of the preferred approach; and
- 11% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SOC 5

There was a high level of support for the preferred approach to Key Issue SOC 5, with 80% (28 No.) of the responses supportive of SOC 5A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- It will be the local aggregates industry, employing local people and using local materials that will provide the building materials to facilitate the provision of recreational and play facilities (POP ref 062).

- New developments should conserve wildlife habitats, existing trees and quality vegetation and promote further biodiversity by providing open space with uncultivated areas and green corridors (POP ref 174).
- The preferred approach would allow for the general policy provisions to be set aside in order for play provision to be assessed on a site by site basis, considering the Play Strategy and would provide direction on larger zonings (POP ref 147).
- New housing schemes over a specific threshold should include open space and leisure and that open space, in new housing developments, should be of sufficient quality and quantity (POP ref 148).

One of the respondents welcomed a tailored approach towards open space and play provision, however highlighted that this should be done on the basis of a sound assessment and understanding of existing provisions within the existing residential / urban areas. The respondent suggested that in determining the appropriate level of provision, the capacity of the site and the impact of such a requirement on the viability of developments should be considered (POP ref 112). Another of the respondents suggested that a survey of existing and future needs be carried out, one that considers the quantity, quality and capacity of the sites, related to population projections and housing requirement (POP ref 119).

Critique of the preferred approach to Key Issue SOC 5

Only 9% (3 No.) of the respondents stated that they were unsupportive of the preferred approach to SOC 5. Some of the accompanying comments that were received in respect of SOC 5 are detailed below.

- This policy has failed in the past due to the inability to obtain insurances at a reasonable rate. Developers would be happy to make the provision if Council would adopt and maintain the spaces (POP ref 173).
- Unless there are methods devised to prevent developers from bringing forward smaller (open space / play provision) schemes that avoid the requirements, the proposals will be ineffective (POP ref 188).

One respondent considered that provision of several equipped play areas throughout a housing development will result in a disproportionate financial burden, with management/maintenance and anti-social behaviour concerns for residents. This respondent considered SOC 5C, a council led approach, to be the appropriate course of action (POP ref 185).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to SOC 5 'Facilitating open space / play provision in new largescale residential developments', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this Key Issue is Planning Policy Statement (PPS) 8: Open Space, Sport & Recreation.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Open Space, Sport and Recreation in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances

include additional provision of equipped play areas on large residential schemes, including, potential for Multi-Use Games Areas (MUGAs).

A more detailed review of PPS 8 will be carried out in advance of the Plan Strategy.

Also note that the following are also relevant policy considerations in respect of open space:

- Planning Policy Statement 2 (PPS 2): Natural Heritage (provides operational policies for open spaces and recreation areas that are protected by international, national and local nature conservation designations);
- Planning Policy Statement 6 (PPS 6): Planning, Archaeology and the Built Heritage (relates to Local Landscape Policy Areas (LLPAs) and/or Historic Parks, Gardens and Demesnes); and
- Planning Policy Statement 7 (PPS 7): Quality Residential Environments- Policy QD 1 (Criterion c).

A more detailed review of these policies will be carried out in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Support for preferred option SOC 5A is noted, however further consideration will be given to regional direction and consultee feedback during policy development in advance of the draft Plan Strategy.

The Council would highlight that our Open Space Strategy is informed by an open space audit which will be updated in advance of the draft Plan Strategy publication.

Preferred Option, for Key Issue SOC 6 (Facilitating community and cultural facilities to meet the needs of the Borough)

Option SOC 6A

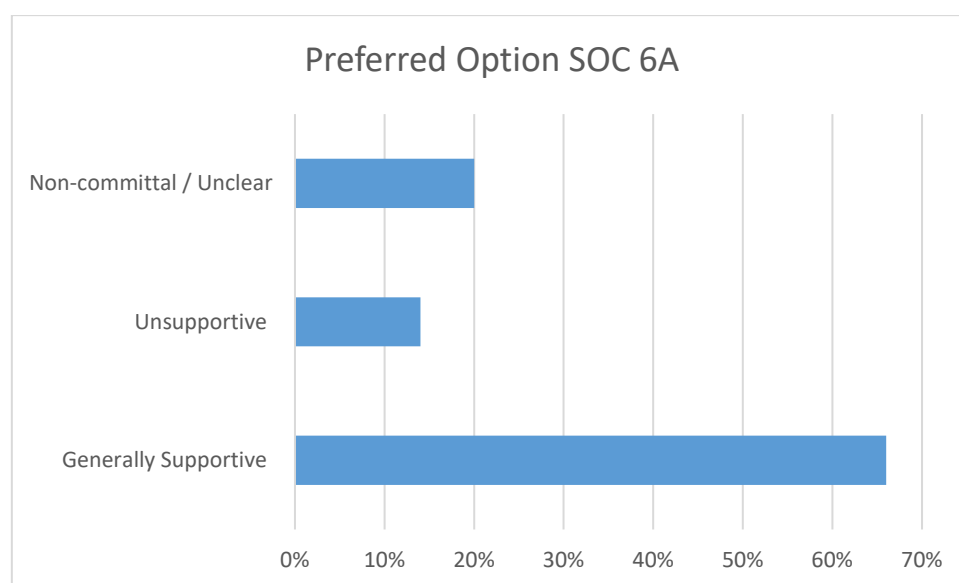
Identify and protect specific sites where a firm proposal is in place; and bring forward a criteria-based policy for development proposals to be assessed against, to facilitate new community and cultural facilities (including extensions to existing facilities).

The preferred approach recommended that specific sites are identified and safeguarded in the LDP for community and cultural facilities and associated infrastructure, through zoning, that are planned for with some certainty by service providers. The preferred approach would also provide a clear criteria-based policy framework for all proposals across the Borough to be assessed against.

Key Issue Response Rate: 14%

29 of the 201 representations received made comment in respect of Key Issue SOC 6 (Facilitating community and cultural facilities to meet the needs of the Borough).

- 66% of the responses were generally supportive of the preferred approach;
- 14% of the responses were unsupportive of the preferred approach; and
- 20% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SOC 6

There was a relatively high level of support for the preferred approach to Key Issue SOC 6, with 66% (19 No.) of the responses supportive of SOC 6A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- The preferred approach takes account of the changing demographics and demands of the Borough (POP ref 148).

- Community infrastructure is an important element of sustainable and high-quality development, providing access for residents to important services and facilities. Community facilities and mixed-use areas should be integral to new residential areas and the time lag between people moving into a development and the provision of community facilities should be minimised (POP ref 174).
- The approach should allow for re-zoning of land previously zoned for other uses, for example there may be a need for a school expansion, and the only suitable site might be under current plans zoned for housing (POP ref 064).

One of the respondents considered that the private sector should be encouraged and supported to work closely with the Council in the delivery of the objectives relating to cultural and community facilities (POP ref 176).

Critique of the preferred approach to Key Issue SOC 6

Only 14% (4 No.) of the responses were unsupportive of the preferred approach to SOC 6. One of the respondents stated that the preferred approach lacks ambition in delivering for the health and wellbeing of the council area's population and simply states what a plan-led system will do. The respondent also stated that the LDP needs to move away from the 'silo' approach and fully embrace the concept of fully integrating the three pillars of sustainable development (POP ref 135).

In addition, there were several non-committal responses (6 No.) that did not offer a specific opinion on the preferred approach, but made recommendations and suggestions in respect of SOC 6:

- Deficits in provision of cultural and community facilities should be identified through the collection of relevant data and the establishment of a robust evidence base- to establish if the need for facilities has increased or if need is already being met (POP ref 113).
- The Council must develop a plan to engage with the Irish Language community and to provide services in the Irish Language. The Irish Language is a treasure that belongs to all of our citizens, and the Council must ensure that it is positively promoted in the context of mutual respect and must ensure the rights of the community are fulfilled (POP ref 125).
- There is a need to ensure essential services are provided especially in disadvantaged areas that give access to information, improve literacy and open wider opportunities (POP ref 147).

One of the respondents considered that an opportunity had been missed by not recognising the important role heritage assets and their setting can play as part of the community and cultural facilities, maintaining a sense of local authentic identity and social pride within their local areas (POP ref 080).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to SOC 6 'Facilitating community and cultural facilities to meet the needs of the Borough', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper.

Planning Strategy for Rural Northern Ireland provides the current operational planning policies for community needs (PSU 1). The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward a criteria-based approach that will broaden Community needs to include 'Cultural' needs and also clearly define the definition of community and cultural facilities. Furthermore, it was recommended that the LDP allows for specific sites to be identified and

safeguarded for community and cultural facilities. A more detailed review of PSRNI policies, in so far as they relate to community need (PSU 1), will be carried out in advance of the Plan Strategy.

Also note that Planning Policy Statement 7 (PPS 7): Quality Residential Environments (Policy QD1 requires developers to make adequate provision for local neighbourhood facilities) and Planning Policy Statement 8 (PPS 8): Open Space, Sport & Recreation (Policy OS 4 acknowledges that indoor leisure and recreation facilities often serve as a focus for the community) are also relevant policy considerations in respect of neighbourhood and community uses. A more detailed review of these policies will be carried out in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Support for the preferred option is welcomed.

In relation to individual zonings and their requirements, further consultation and site evaluations will be carried out in advance of the Local Policies Plan.

The Council considers that the provision of cultural and community facilities should be based on robust evidence to justify their provision and this also applies to the location of cultural and community facilities beyond town centres. However, it is recognised that as the LDP will provide a long-term planning framework there needs to be a degree of flexibility to enable it to deal with changing circumstances or an unforeseen need.

Preferred Option, for Key Issue SOC 7 (Facilitating development through Developer Contributions)

Option SOC 7A

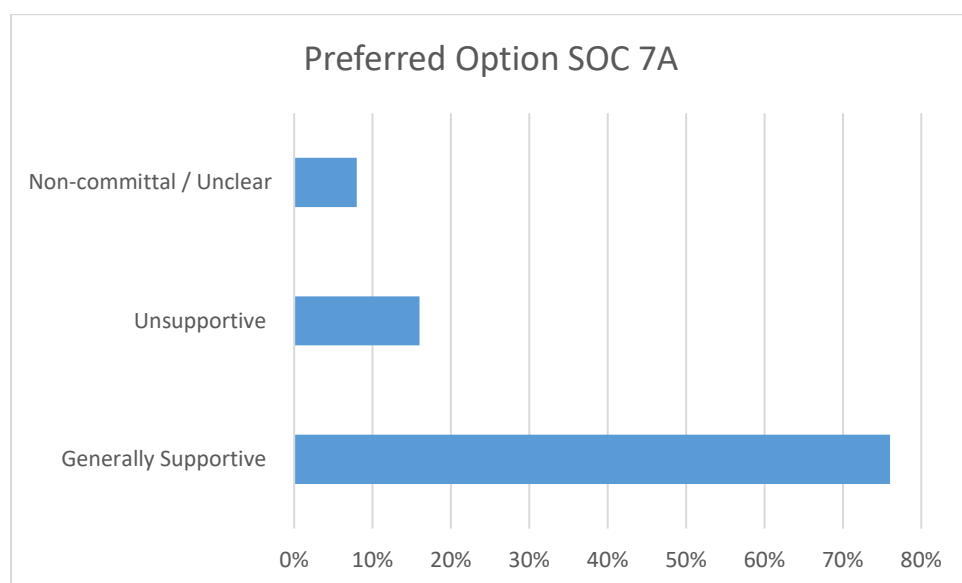
Provide strategic policy on developer contributions and identify sites where developer contributions would be appropriate in the Local Policies Plan.

The preferred approach recommended bringing forward a strategic policy that would clarify when developer contributions would be required, including the anticipated level of contribution and any exemptions if necessary. The preferred approach also recommended that the LDP identify sites where developer contributions would be appropriate, so to provide a level of certainty for developers and other stakeholders involved in the development process.

Key Issue Response Rate: 18%

37 of the 201 representations received made comment in respect of Key Issue SOC 7 (Facilitating development through Developer Contributions).

- 76% of the responses were generally supportive of the preferred approach;
- 16% of the responses were unsupportive of the preferred approach; and
- 8% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue SOC 7

There was a high level of support for the preferred approach to Key Issue SOC 7, with 76% (28 No.) of the responses supportive of SOC 7A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- The preferred approach is absolutely the correct approach; it is sensible to consider the wider impact of large-scale development on infrastructure of the whole area (POP ref 064).

- Policies on the use of planning agreements is welcomed; in certain circumstances they can have a positive impact on an area, such as infrastructural improvements and provision of community facilities (POP ref 079).
- Developer contributions could create opportunities for the promotion and interpretation of the historic environment and offer important opportunities to facilitate archaeological investigation and mitigation (POP ref 080).
- A developer contribution policy could help fund additional community infrastructure that is needed to contribute to the development of sustainable communities' and their well-being. Housing Associations should be exempt from providing developer contributions, as these are charitable and not for profit organisations (POP ref 174).

A number of the respondents also made suggestions on how the approach to developer contributions may be further developed, some of which are detailed below.

- The viability of contributions should be assessed to ensure that viable sites are zoned for development. To zone land without an understanding of the financial implications (likely level of contributions) and requirements of open space, highway improvement and affordable housing etc. could undermine the deliverability of the site (POP ref 112).
- The levels of financial contributions will require careful consideration, if set incorrectly this may suppress development opportunities (POP ref 123).
- Clear direction on the circumstances requiring Developers Contributions and the thresholds at which they are set will be of great benefit to all going forward. The level of contributions should be realistic so as not to bar development and instances whereby exceptions may be applied should be written into policy (POP ref 185).

Critique of the preferred approach to Key Issue SOC 7

A relatively low number of respondents (16% / 6 No.) did not support the preferred approach to SOC 7. Some of the accompanying comments that were received in respect of SOC 7 are detailed below.

- It is not a private developer's responsibility to provide infrastructure. The development should have benefits for the local area and as such the Government should create infrastructure (POP ref 004).
- The use of thresholds to solely clarify when developer contributions are required, including the anticipated level of contribution and any exemptions, if necessary, could result in situations where developments (under the threshold, and therefore not subject to the contribution requirement) could create deficiencies in or add to existing problems with regard to infrastructure needed to serve the development (POP ref 135).
- Developers might be enabled to 'pay' their way through problematic development, regardless of the promised safeguards. Financial inducements to communities allow for manipulation of the population and enhance divisions within communities (POP ref 181).
- Developer contributions are problematic, result in stunted development (and resultant inflation of housing prices) and the contributions skirting dangerously close to "facilitation fees" (POP ref 188).

One respondent was supportive of a combination of alternative options SOC 7A and 7B and considered that thresholds should be identified as part of 'Key Site Requirements' when considering specific sites, so that any contributions are appropriate, relevant and necessary to mitigate against the proposed development (POP ref 148).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to SOC 7 'Developer Contributions', in particular the high level of support for the preferred approach. It was acknowledged that the approach to developer contributions needs to be reasonable.

Our comments

Support for the preferred option is welcomed. It is considered that further evidence gathering, including consultation with DfI and other stakeholders, is required to allow policy on developer contributions to be progressed further.

It is also recognised that careful consideration is required to the level of developer contributions so that it does not deter inward investment.

7 Economic Theme

Within the POP's economic theme, 18 Key Issues are grouped across 7 topic areas, with the collective aim of supporting the Council's strategic objective for growing the local economy. The central focus of the economic theme is on facilitating sustainable growth through the LDP policies and land-use proposals that contribute towards a dynamic, diverse and robust economy.

This section deals with the following Key Issues:

Economic Development – Urban

Key Issue ECN 1: Zoning for economic development

Key Issue ECN 2: Locating Class B1 Business Uses

Key Issue ECN 3: Supporting start-up and grow-on businesses

Economic Development – Rural

Key Issue ECN 4: Supporting sustainable rural economic development

Town Centres and Retailing

Key Issue ECN 5: Defining a hierarchy of centres

Key Issue ECN 6: Protecting and strengthening town centres

Key Issue ECN 7: Supporting the evening and night-time economy

Key Issue ECN 8: Facilitating office development (Class A2 Uses)

Key Issue ECN 9: Identifying Development Opportunity Sites (DOSs)

Tourism

Key Issue ECN 10: Supporting sustainable tourism development

Minerals Development

Key Issue ECN 11: Supporting sustainable minerals development

Infrastructure, Telecommunications and Utilities

Key issue ECN 12: Facilitating sustainable infrastructure, telecommunications and utilities development to meet the needs of the Borough Transportation

Key Issue ECN 13: Protecting the Borough's Protected Routes

Key Issue ECN 14: Protecting proposed strategic road improvement schemes

Key Issue ECN 15: Protecting the Borough's Disused Transport Routes

Key Issue ECN 16: Protecting key Park and Ride Sites

Key Issue ECN 17: Promoting active travel and sustainable transport

Key Issue ECN 18: Promoting and enhancing access to greenways

Preferred Option, for Key Issue ECN 1 (Zoning for Economic Development)

Option ECN 1A

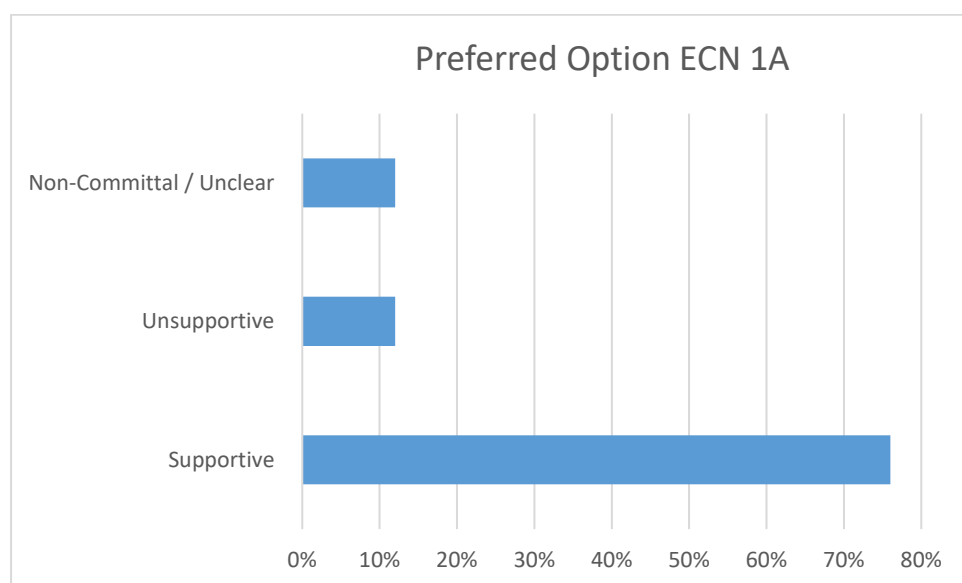
Evaluate existing economic development zonings and identify new sustainably located sites to meet projected needs.

The preferred approach recommended that economic development land zonings are re-evaluated to assess their continued suitability for economic development and that more sustainable sites such as those with good digital connectivity, adjacent to key transportation networks and within population centres are considered. In addition, the preferred approach would also enable the LDP to identify new economic development sites in areas of social deprivation.

Key Issue Response Rate: 13%

26 of the 201 representations received made comment in respect of Key Issue ECN 1 (Zoning for Economic Development).

- 76% of the responses were generally supportive of the preferred approach;
- 12% of the responses were unsupportive of the preferred approach; and
- 12% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 1

There was a high level of support for the preferred approach to Key Issue ECN 1, with 76% (20 No.) of the responses supportive of ECN 1A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- A comprehensive review of all current economic development zonings within the Borough is welcomed (POP ref 124).

- A full audit and review of existing employment locations to determine land availability and demand is welcomed. This requires a critical analysis of why existing sites have not been developed and identification of barriers to development so to ensure that an ample supply of economic land is in the right strategic locations for the future (POP ref 148).
- Employment growth should be focused in areas well served by sustainable forms of transport in order to help remove barriers to accessing employment. Employment growth should be targeted towards areas of deprivation to help to support and regenerate these communities (POP ref 174).

Another of the respondents, whilst supportive of the preferred approach to zoning for economic development, suggested that consideration should be given to how transitions between zonings are considered. The respondent suggested a phased approach to zoning, so heavy industry is surrounded by light industry or shops, which would act as a buffer between residential areas (POP ref 064).

Although they considered that the preferred approach is broadly line with the RDS Employment Land Evaluation Framework, one of the respondents highlighted that there is a requirement to tackle disadvantage and facilitate job creation by ensuring the provision of a generous supply of land suitable for economic development and a choice and range in terms of quality (POP ref 113).

Critique of the preferred approach to Key Issue ECN 1

Only 12% (3 No.) of the responses were unsupportive of the preferred approach to ECN 1. Some of the comments and suggestions that were received are detailed below:

- There needs to be a stronger emphasis on implementing the Employment Lands Evaluation Framework as outlined in the RDS, this is key to undertaking a comprehensive review of all current economic development land zonings within the Borough (POP ref 135).
- Any new sites identified, including those in areas of social deprivation need to further the principles of sustainable development. The re-use of previously developed economic development sites and buildings for other uses must also demonstrate how the principles of furthering sustainable development are achieved. Greater emphasis should be made to the commitment of exploring brownfield sites in identifying future economic sites (POP ref 135).
- The options are predicated on the acceptance of the Settlement Hierarchy and any conclusions drawn here are invalid in the absence of such agreement (POP ref 188).

In addition, there were several non-committal responses (3 No.) that did not offer a specific opinion on the preferred approach but made suggestions as to how ECN 1 may be further progressed. One of the respondents highlighted that it should be demonstrated how the historic environment evidence has been used in informing zonings and mitigation such as the need for Key Site Requirements (POP ref 080). Another of the respondents considered that both the review and identification of existing and new economic development land should include ecological assessment to determine whether there are environmental issues to be addressed (POP ref 82).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 1 'Zoning for Economic Development' and highlighted that accessibility needs to be considered when the Council is establishing locations for economic development land.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are Planning Policy Statement (PPS)

4: Planning and Economic Development and Planning Policy Statement (PPS) 4 Clarification of Policy PED 7.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Economic Development in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include: -

- Facilitate call centres and research and development proposals within industrial areas and identify areas within larger settlements for B1 Office use.
- Identify sites specifically for Start-Up and Grow-On business space.
- Tailoring policy to accommodate the specific local needs for rural economic development (such as the apple orchards / cider initiative).
- Clarification of the definition of 'Major Expansion.'

A more detailed review of PPS 4: Planning and Economic Development and PPS 4: Clarification of Policy PED 7 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Council welcomes the support for the preferred option however would like to emphasise that the option is to evaluate existing and identify new economic zonings where appropriate, the option does not make reference to what Use Classes or services that may be suitable on individual sites at this time.

As part of the review of economic development land at LPP stage, the Council will consider the compatibility of existing adjacent uses and potential rezonings. Options ECN1A, 2A and 3A facilitate the consideration of more sustainable sites such as those adjacent to key transportation corridors (increasing accessibility) and would also allow the LDP to identify new sites in areas of social deprivation. To this end, a review of the available economic development land within the Borough will be carried out to inform the draft Plan Strategy economic lands allocation.

Council will ensure there is a generous supply of economic development land to provide a choice and range of sites in terms of size and location and promote flexibility and provide for varying needs.

Preferred Option, for Key Issue ECN 2 (Locating Class B1 Business Uses)

Option ECN 2A

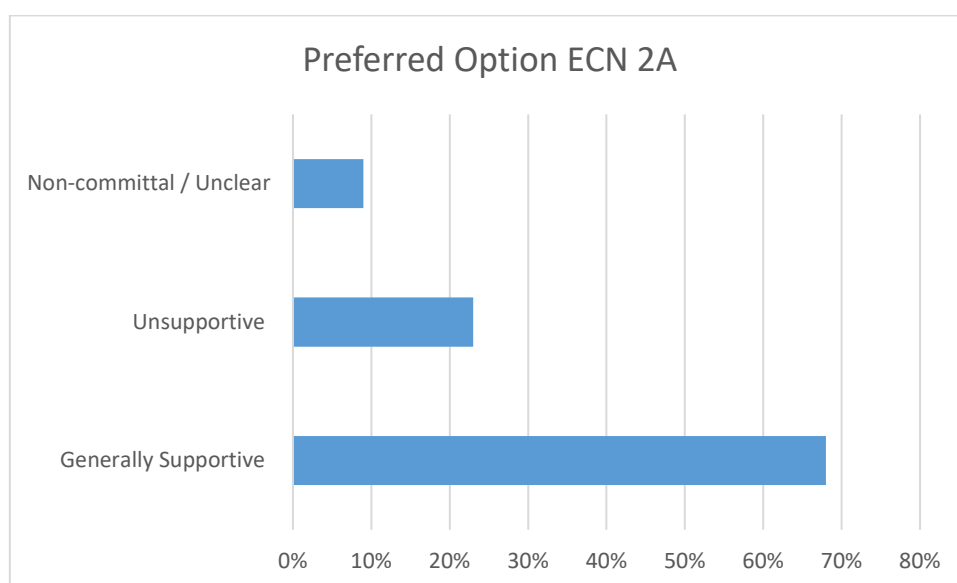
Allow UCO Class B1* Business Uses in Town Centres, District Centres or Local Centres and within economic development zonings (as identified in the LDP) as part of a sequential approach.

The preferred approach recommended the promotion of town centres first or district / local centres (where identified in the LDP) for B1 use. The preferred approach also recommended that the LDP facilitate call centres and research and development proposals within existing or proposed economic development areas and identify areas within larger settlements for B1 Office Use, so to support economic growth in areas such as the digital sector.

Key Issue Response Rate: 11%

22 of the 201 representations received made comment in respect of Key Issue ECN 2 (Locating Class B1 Business Use).

- 68% of the responses were generally supportive of the preferred approach;
- 23% of the responses were unsupportive of the preferred approach; and
- 9% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 2

There was a relatively high level of support for the preferred approach to Key Issue ECN 2, with 68% (15 No.) of the responses supportive of ECN 2A. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

- The preferred approach is in line with current policy by promoting a sequential approach to Class B1 Business Uses (POP ref 079).
- The Key is making the town and city centres, district centres or local centres designations for all, where the range and type of uses must be diverse to appeal to the widest number of users and

attract significant footfall. They should be the focus of administration, commercial, cultural, leisure, entertainment, arts and retail activity, so they are not limited to the daytime economy (POP ref 148).

- The preferred approach is consistent with the SPPS and would promote the viability and vitality of existing town centres within the Borough (POP ref 113).

Critique of the preferred approach to Key Issue ECN 2

Almost a quarter of respondents (23% / 5 No.) who submitted comments in respect of ECN 2 did not support the preferred approach. Some of the accompanying comments that were received are detailed below.

- There should be no town centre first policy and no restrictions placed on economic development. Out of town industrial estates work reasonably well in the council area, people are able to go to their work or about their business with ease and this should not be changed, forcing everyone into town centres would only create more traffic congestion (POP ref 004).
- Class B1 offices should not be subject to a sequential approach and be required to rule out potential town centre sites before looking at other areas. Offices are a major contributor to the town centre, but they only operate during the day. There is a focus on providing as diverse mix of uses in town centres, including strengthening the night-time /evening economies. There is the opportunity to attract offices across appropriate locations within the Borough (POP ref 185).

One of the respondents, whilst acknowledging that the approach would offer flexibility for Class B1 uses, considered that the preferred approach may lead to an increase in refusals based on amenity issues such as noise, traffic congestion and smells, however offered no further justification or rationale (POP ref 179).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 2 'Locating Class B1 Business Uses', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are Planning Policy Statement (PPS) 4: Planning and Economic Development and Planning Policy Statement (PPS) 4 Clarification of Policy PED 7.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Economic Development in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include: -

- Facilitate call centres and research and development proposals within industrial areas and identify areas within larger settlements for B1 Office use.
- Identify sites specifically for Start-Up and Grow-On business space.
- Tailoring policy to accommodate the specific local needs for rural economic development (such as the apple orchards / cider initiative).
- Clarification of the definition of 'Major Expansion.'

A more detailed review of PPS 4: Planning and Economic Development and PPS 4: Clarification of Policy PED 7 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Support for our preferred approach is welcomed.

It is considered that placing no restrictions on where economic development should locate is at odds with the purpose of the LDP and regional guidance which is to provide the policy framework and land use proposals that will guide development decisions within the Borough up to 2030.

Preferred Option, for Key Issue ECN 3 (Supporting start-up and grow-on businesses)

Option ECN 3A

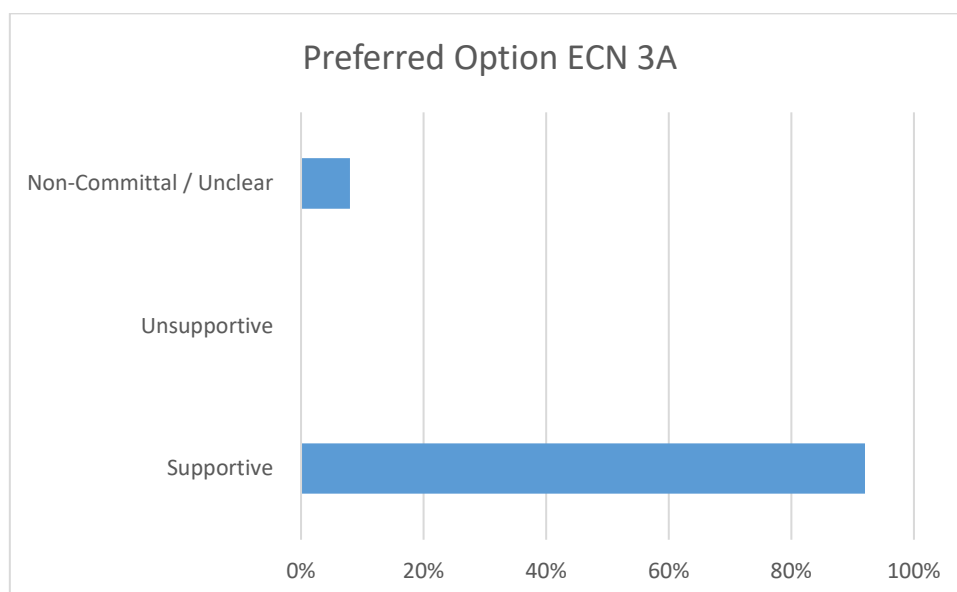
Identify sites within economic development zonings specifically for start-up and grow-on business space and also use redundant buildings or lands on existing economic sites for start-up and grow-on business space.

The preferred approach proposed that new economic development lands suitable for start-up and grow-on businesses would be identified within existing settlements as well as vacant or redundant buildings and lands where the last use was an economic development use. The preferred approach recommended that a variety of sites / land should be specifically zoned for start-up and grow-on businesses in the LDP.

Key Issue Response Rate: 12%

24 of the 201 representations received made comment in respect of Key Issue ECN 3 (Supporting start up and grow on businesses).

- 92% of the responses were generally supportive of the preferred approach;
- 0% of the responses were unsupportive of the preferred approach; and
- 8% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 3

There was a high level of support for the preferred approach to Key Issue ECN 3, with 92% (22 No.) of the responses supportive of ECN 3A. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

- Utilising buildings which are currently unoccupied, which in some cases may be former industrial properties, would enable them once again to assist in economic growth (POP ref 111).
- The preferred option would support growth of land and increase the uses available, in particular in areas of land currently not in use (POP ref 137).
- The Borough should be aiming to supply world class companies and employees in these areas (existing settlements as well as vacant or redundant buildings and lands where the last use was an economic development use) as this will encourage growth and inward investment (POP ref 148).

Whilst one of the respondents welcomed the positive policy approach, they expressed concern for potential inappropriate re-use or unsympathetic alteration of heritage assets and their setting if there is a presumption in favour of promoting start up or grow on business on economic grounds at the expense of other policies such as the protection, conservation and enhancement of our archaeology and built heritage (POP ref 080).

Another respondent was supportive of the move towards flexibility for alternative uses on redundant industrial sites, however suggested that more flexibility in the potential uses is needed (POP ref 115).

Whilst one of the respondents considered that the identification of redundant buildings / lands sites for 'start-up' and 'grow-on' business space would help to stimulate local investment and enterprise, they suggested that the Council should be mindful of the requirement to promote mixed use development and improve integration between transport, economic development and other land uses when bringing forward future policy direction (POP ref 113).

Critique of the preferred approach to Key Issue ECN 3

None of the representations submitted in relation to ECN 3 were categorised as being unsupportive of the preferred approach. A small number (8% / 2 No.) of non-committal responses were received in respect of this Key Issue. Whilst these responses did not offer a specific opinion on the preferred approach, one made the following comment in respect of this Key Issue:

- There is no reference within this section to furthering sustainable development, or to the natural environment. In terms of the latter, no mention is made of its complex variety of wildlife and habitats and the ecosystems services it provides. There is no recognition that the environment, in terms of its natural heritage is one of Northern Ireland's and indeed the Boroughs greatest assets (POP ref 135).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 3 'Supporting start-up and grow-on businesses' and acknowledged that further engagement would be required to identify specific lands for such businesses.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this Key Issue is Planning Policy Statement (PPS) 4: Planning and Economic Development and Planning Policy Statement (PPS) 4 Clarification of Policy PED 7.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Economic Development in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include: -

- Facilitate call centres and research and development proposals within industrial areas and identify areas within larger settlements for B1 Office use.
- Identify sites specifically for Start-Up and Grow-On business space.
- Tailoring policy to accommodate the specific local needs for rural economic development (such as the apple orchards / cider initiative).
- Clarification of the definition of 'Major Expansion.'

A more detailed review of PPS 4: Planning and Economic Development and PPS 4: Clarification of Policy PED 7 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The support for option ECN 3A is welcomed. In the draft Plan Strategy the quantum of economic development lands will be identified, however individual economic development land zonings will not be identified until LPP stage.

Preferred Option, for Key Issue ECN 4 (Supporting Sustainable Rural Economic Development)

Option ECN 4A

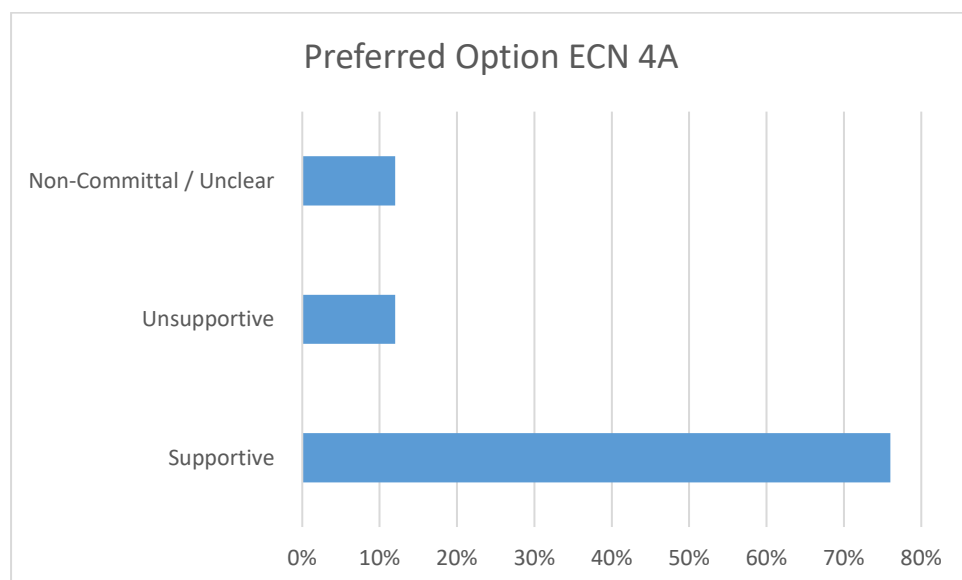
Support a sustainable approach to rural economic development in line with existing policies and regional direction, tailored to meet local circumstances, including in relation to facilitating the apple orchard / cider tourism experience.

The preferred option proposed a controlled approach to economic development in the countryside; however, instances where development of an appropriate nature and scale would be considered acceptable would also be identified, subject to appropriate policy criteria.

Key Issue Response Rate: 13%

26 of the 201 representations received made comment in respect of Key Issue ECN 4 (Supporting Sustainable Rural Economic Development).

- 76% of the responses were generally supportive of the preferred approach;
- 12% of the responses were unsupportive of the preferred approach; and
- 12% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 4

There was a high level of support for the preferred approach to Key Issue ECN 4, with 76% (20 No.) of the responses supportive of ECN 4A. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

- The locally tailored approach (orchard / cider tourism) is welcomed, it creates the opportunity to reinforce, respect, maintain and strengthen local identity and character distinctiveness (POP ref 080).

- The preferred approach is in line with the existing policy led approach but tailored to meet local circumstances, whilst ensuring that the need for development is balanced against environmental and amenity issues whilst protecting the existing tourism asset (POP ref 079).
- The intention to allow more flexibility for economic development in the countryside is welcomed however care should be taken in wording new policies to ensure that such uses are compatible with existing development/land uses (POP ref 177).
- ECN 4A is the better option but would be improved by recognition of the potential of developing the Armagh - Monaghan Greenway, the area around Carrigatuke and Fews (POP ref 147).

One supportive representation suggested that businesses trying to meet the objectives of the Local Development Plan should be given preference in rural areas. For example, those businesses addressing health and well-being, advocating public/outdoor spaces or addressing issues facing the ageing population, including residential care homes, doctors, treatment centres, pharmacies, dentists and other essential services in rural towns and villages (POP ref 176).

Another respondent welcomed the Councils recognition that key to sustaining rural communities is supporting rural economic development of an appropriate nature and scale in appropriate locations. However, the respondent highlighted that it is important that rural businesses that have arisen in response to a particular need, are afforded opportunity to develop in that locale. The respondent advised that the cost implications of relocating a small rural business to a larger settlement can be prohibitive and limited local growth will allow them to reach a stage of financial capability to make the move in due course (POP ref 111).

One of the respondents was supportive of appropriate small-scale workshops or farm diversification projects within the countryside, as long as they are appropriate in scale, and sensitive to the environment, amenity and rural landscapes (POP ref 174).

Critique of the preferred approach to Key Issue ECN 4

Only 12% (3 No.) of the responses were unsupportive of the preferred approach to ECN 4, however some of the comments that were received are detailed below:

- The approach falls short in recognising the environments complex variety of wildlife and habitats and the ecosystems services it provides. Cognisance to environmental considerations should form part of the policy wording to include a demonstration that there is no detrimental impact on biodiversity or on sensitive environmental areas and features (including species and habitats) (POP ref 135).
- The apple orchard tourism seems to be overplayed (POP ref 006).
- Apart from the reference to facilitating the apple orchard /cider tourism experience, there is no other reference to tourism development within the economic theme, despite the economic objective to support tourism development. This theme needs to be tied with the Key Issue ECN 10 (Tourism Development) and vice versa (POP ref 135).

A small number (3 No.) of non-committal responses were received in respect of this Key Issue. Whilst these responses did not offer a specific opinion on the preferred approach, they made the following comments and suggestions in respect of this Key Issue:

- Whilst the linkage to wider Council strategies is welcomed, greater detail is required regarding the nature and scale of economic proposals likely to be considered acceptable in the Countryside and the policy criteria to which such proposals will be subjected (POP ref 113).

- There are synergies between ECN 4A and ECN 10A (The preferred approach towards Tourism Development), the Council should give due recognition of the contribution of existing and new forests and woodland to the tourism potential of the area (POP ref 126).

One of the respondents considered that economic development in the countryside is being poorly served in the Borough, and that much more could be made of the beautiful heritage and scenery. The respondent considered that opportunities to link in with other regions have been missed, including trans-border opportunities, such as extending 'Ireland's Ancient East', a very popular tourist trail and a very valid addition to this part of the North (POP ref 181).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 4 'Supporting sustainable rural Economic Development.' Members agreed that the preferred approach is strategic in nature however also welcomed the localised promotion of the apple / cider industry. Members stated that at this stage of the LDP process the Council cannot be too prescriptive as the scope of rural economic development is broad. The provision of greater flexibility in rural economic policy was also discussed; however it was acknowledged that any policy adjustment in relation to rural businesses would require robust evidence to support it otherwise it may compromise the soundness of the LDP.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are Planning Policy Statement (PPS) 4: Planning and Economic Development and Planning Policy Statement (PPS) 4 Clarification of Policy PED 7.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Economic Development in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include: -

- Facilitate call centres and research and development proposals within industrial areas and identify areas within larger settlements for B1 Office use.
- Identify sites specifically for Start-Up and Grow-On business space.
- Tailoring policy to accommodate the specific local needs for rural economic development (such as the apple orchards / cider initiative).
- Clarification of the definition of 'Major Expansion.'

A more detailed review of PPS 4: Planning and Economic Development and PPS 4: Clarification of Policy PED 7 will be carried out in advance of the Plan Strategy.

Also note that Planning Policy Statement 21 (PPS 21): Development in the Countryside is also a relevant policy consideration in respect of rural economic development, in particular Policy CTY: 4 The Conversion and Reuse of Existing Buildings, Policy CTY 11: Farm Diversification and Policy CTY 8 – Ribbon Development. A more detailed review of PPS 21 will be carried out in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

General support for the preferred option ECN 4A is welcomed.

One of the strategic objectives (Economic Pillar) of the LDP includes recognising the growing importance of self-employment, homeworking and farm diversification in the countryside. The key

challenge for the LDP is to facilitate such development provided that it is in an appropriate location and is of an acceptable nature and scale.

The comments regarding policy wording are noted. The SPPS states that the LDP should bring forward appropriate policies and proposals that must reflect the policy approach of the SPPS, tailored to the specific circumstances of the area. Further engagement with key stakeholders will be carried out to inform the wording of draft policy.

Preferred Option, for Key Issue ECN 5 (Defining a Hierarchy of Centres)

Option ECN 5A

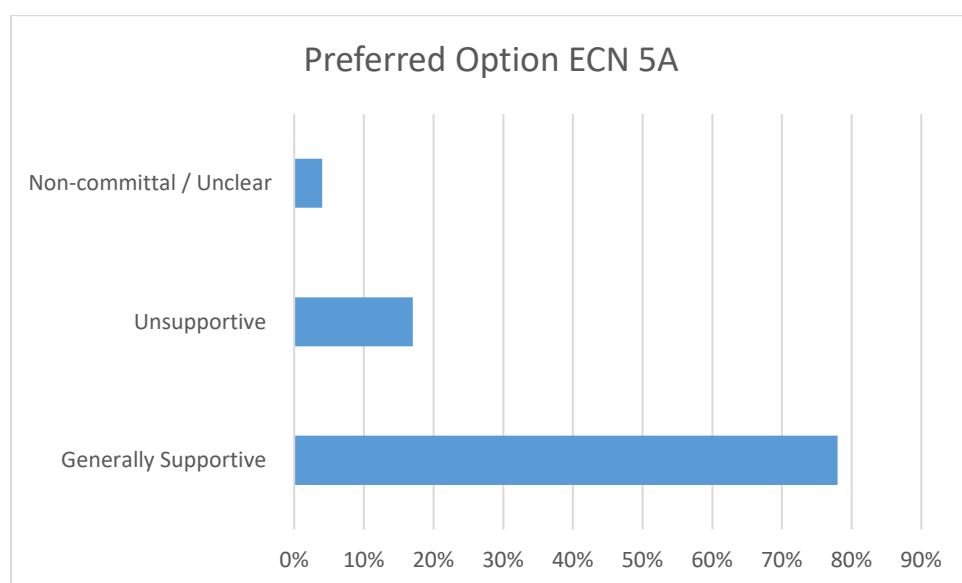
Identifying a new hierarchy of centres, within settlements based upon the current role and function of our centres and identify new centres where appropriate.

The preferred approach recommended a review of the existing Hierarchy of Centres so it would more accurately reflect the role and function of the centres in terms of the retail provision and services that they provide. The preferred approach also recommended the identification of new centres, where appropriate.

Key Issue Response Rate: 11%

23 of the 201 representations received made comment in respect of Key Issue ECN 5 (Defining a Hierarchy of Centres).

- 78% of the responses were generally supportive of the preferred approach;
- 17% of the responses were unsupportive of the preferred approach; and
- 4% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 5

There was a relatively high level of support for the preferred approach to Key Issue ECN 5, with 78% (18 No.) of the responses supportive of ECN 5A. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

- It is appropriate to review the existing Hierarchy of Centres to ensure that it aligns with the strategic regional direction, and in order to identify if any settlements need to be re-designated, based on their functions, range of services and anticipated levels of growth (POP ref 174).
- The LDP process presents an opportunity to achieve an integrated vision for the 3 Craigavon centres and update it with a current and more detailed evidence base, for example a Borough wide retail (and main town centres uses) study (POP ref 100).

- District and Local Centres should be a focus of local everyday shopping and that their role should be complementary to the role and function of town centres in line with the SPPS (POP ref 113).
- It is appropriate that a new hierarchy of centres is identified, based on their role and function across the Borough. Whether a site serves as a local centre is a question of its function rather than its form. A site with a single unit may function as a local centre with a general grocery store, post office and deli under one roof. The view that only a group of small shops constitutes and functions as a local centre is out of date and unreflective of the convenience retail sector (POP ref 134).

One of the respondents, although accepting of the hierarchy approach, considered that an opportunity had been missed by not recognising the important role the historic environment plays in the development of town centres, and how the hierarchy of centres developed (POP ref 080).

Critique of the preferred approach to Key Issue ECN 5

17% (4 No.) of the respondents who submitted comments in respect of ECN 5 did not support the preferred approach. 2 No. of the responses were categorised as being unsupportive of the preferred approach as they suggested an alternative hierarchy of centres. One of the respondents proposed a hierarchy consisting of 3 tiers: Tier 1: City / Town Centre, Tier 2: District Centre, Tier 3: Local Centre. The respondent suggested that this would be sound, consistent and would accord with the classifications in the SPPS, with scope to consider additional smaller scale retail facilities (Village / Neighbourhood Centre) based on need, as per the SPPS (POP ref 148). The other respondent acknowledged that the Key Issue does not reference out of town shopping centres, locations which do not fit neatly into any of the retailing centres hierarchy. As such the respondent suggested an additional tier (a five-tier hierarchy as opposed to a four-tier hierarchy) within the hierarchy, just below Main Town Centre and above District Centre (POP ref 185).

1 non-committal response was received in respect of ECN 5. Whilst this response did not offer a specific opinion on the preferred approach, it suggested that the identification of centres should not be restricted to those within settlements, as many 'centres' exist outside settlement limits that service nearby populations. The respondent also highlighted that Richhill is the largest village in the council area both in terms of its physical size and population size, therefore it is important to ensure that Richhill has an appropriate level of local services and retail provision to accommodate existing residents and future growth (POP ref 071).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 5 'Defining a Hierarchy of Centres.' Elected Members discussed how out-of-town retailing would be managed in the LDP and acknowledged that whilst the Retail Capacity Study would assist in determining the best approach, the Council need to take account of regional direction.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The introduction of the Strategic Planning Policy Statement for Northern Ireland (SPPS) cancelled the publication of PPS 5: Retailing and Town Centres and as such a review of PPS 5 was not carried out.

Our comments

The overall support for the proposed hierarchy of centres is welcomed. Further consideration shall be given to the specific comments and concerns raised in respect of this key issue. In advance of the Draft Plan Strategy further evidence gathering will be carried out to inform the classification of our

centres (based on their role and function) and to establish the appropriate thresholds for each tier. The thresholds for each tier within the hierarchy will be clearly set out at the Plan Strategy stage.

The preferred approach identifies village centres as an option to serve local needs, however further consideration will be given to the need/purpose for identifying village centres in advance of the Draft Plan Strategy.

Preferred Option, for Key Issue ECN 6 (Protecting and Strengthening town centres)

Option ECN 6A

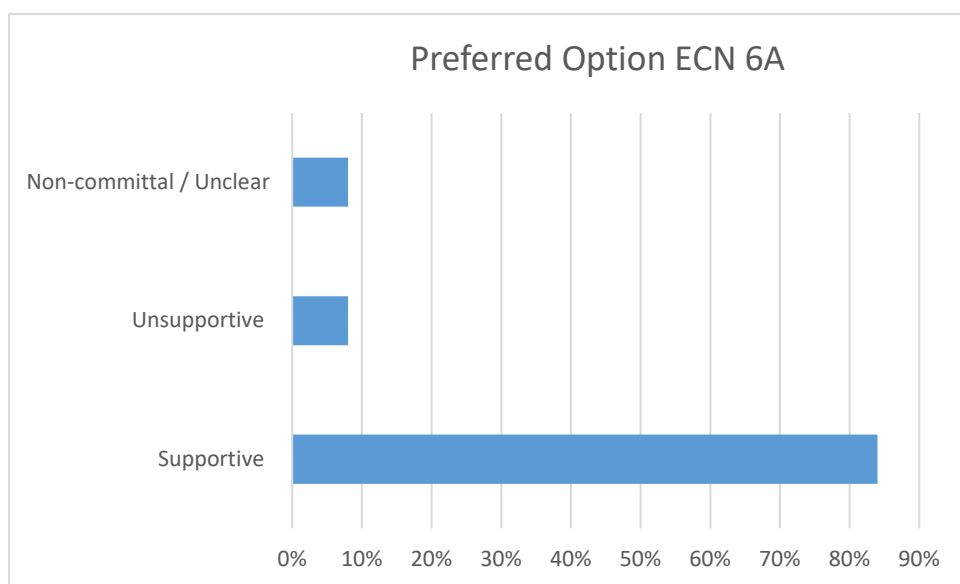
Review and Identify Town Centre Boundaries and Primary Retail Cores, where appropriate, accompanied by policy to protect and strengthen town centres.

The preferred approach proposed the introduction of a consistent approach towards Town Centre Boundaries and Primary Retail Cores across the Borough. Furthermore, the preferred approach recommended a review of the existing Town Centre Boundaries, Primary Retail Cores and Primary Retail Frontages for the centres so that they may be amended where necessary.

Key Issue Response Rate: 12%

24 of the 201 representations received made comment in respect of Key Issue ECN 6 (Protecting and Strengthening town centres).

- 84% of the responses were generally supportive of the preferred approach;
- 8% of the responses were unsupportive of the preferred approach; and
- 8% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 6

There was a high level of support (84% / 20 No.) for the preferred approach to ECN 6. The following illustrates the range of comments that were received in respect of ECN 6A:

- The preferred option aligns with the approach outlined in the SPPS. Policy should not restrict opportunities for future growth and diversification and that they should incorporate a degree of flexibility in relation to scale and use (POP ref 100).
- A healthy range and balance of uses within centres is important to ensure their vitality and vibrancy, it is welcomed that employment is one such use considered acceptable in town centres (POP ref 111).

- It is appropriate that town centre boundaries and primary retail cores will be reviewed. In the context of the retail sector evolving and adapting, LDP policies for town centres and primary retail cores need to support investment and deliver development. (POP ref 134).
- Defining a Primary Retail Core accompanied by policy to substantially protect and promote retail uses at ground floor and the designation of sites for mixed uses will enable policies to come forward to promote active retail frontages, drive footfall and protect the vitality and viability from competing non-retail uses (POP ref 148).

One of the respondents considered that the preferred approach offers an opportunity to reimagine the development of the town centres and retail cores. The respondent advised that they must reflect the need to develop safe pedestrianised areas within the retail core, with an adequate public transport system, one that promotes disabled access so to encourage more visitors into our urban centres (POP ref 147).

Another respondent advised that the LDP should consider the long-term future of town centres in the context of changed shopping patterns, the increase in vacant units and consequent need to diversify uses. Furthermore the respondent suggested that the LDP should promote a mix of uses in the centre to meet local shopping demand in an accessible location, as they will not only increase activity levels and footfall in an area but can also strengthen the resilience of a place against economic changes (POP ref 174).

Critique of the preferred approach to Key Issue ECN 6

Only 8% (2 No.) of the responses were unsupportive of the preferred approach to ECN 6, however some of the comments that were received are detailed below:

- Primary Retail Core policies may be considered inflexible in certain locations and have been detrimental to the vitality and viability of town centres due to them being unresponsive and unable to adapt to changing economic and social pressures (POP ref 185).
- Retailing units should not have priority on town centre property, town centres should be open to all businesses (POP ref 004)

A small number (2 No.) of non-committal responses were received in respect of this Key Issue. Whilst these responses did not offer a specific opinion on the preferred approach, they made the following comments in respect of this Key Issue:

- It should be considered how the full potential of historic environment assets in centres can be captured and establish how they may play a key role in informing design in the towns to local centres settlements (POP ref 080).
- The approach should reference the high accessibility offered in town centres. Town centres are generally the focus of walking, cycling and public transport networks and therefore strong town centres will naturally assist in increasing use of sustainable transport modes (POP ref 113).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 6 'Protecting and strengthening town centres', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The introduction of the Strategic Planning Policy Statement for Northern Ireland (SPPS)

cancelled the publication of PPS 5: Retailing and Town Centres and as such a review of PPS 5 was not carried out.

Our comments

The overall support for the preferred approach in relation to reviewing and identifying town centre boundaries and primary retail cores is welcomed. The Council will ensure that all comments are fully considered as part of the review.

It is acknowledged that the regional direction is clear in respect of town centres. In order to provide a diverse offering and mix of uses to reflect local circumstances the town centres are the appropriate first choice locations for retailing and other complementary town centre uses. As such the LDP must secure an appropriate balance between the promotion of retail development and enhancing diversity in the range of town centre uses such as employment, residential, cultural and leisure uses.

The Council acknowledges that in order to develop economically competitive and vibrant town centres, address vacancy rates and ensure their position as the appropriate first choice locations for retailing and other complementary functions, it is essential that diversification of appropriate town centre uses is promoted in line with strategic direction.

As part of the review a retail capacity study will be carried out to inform the extent of the town centre and primary retail core boundaries to determine their need and capacity and ensure the correct balance of land use can be delivered to reflect the unique circumstances of each town centre.

To this end, a land-use survey of the existing town centres will be carried out to inform the retail / leisure study and the draft Plan Strategy.

Preferred Option, for Key Issue ECN 7 (Supporting the evening and night-time economy)

Option ECN 7A

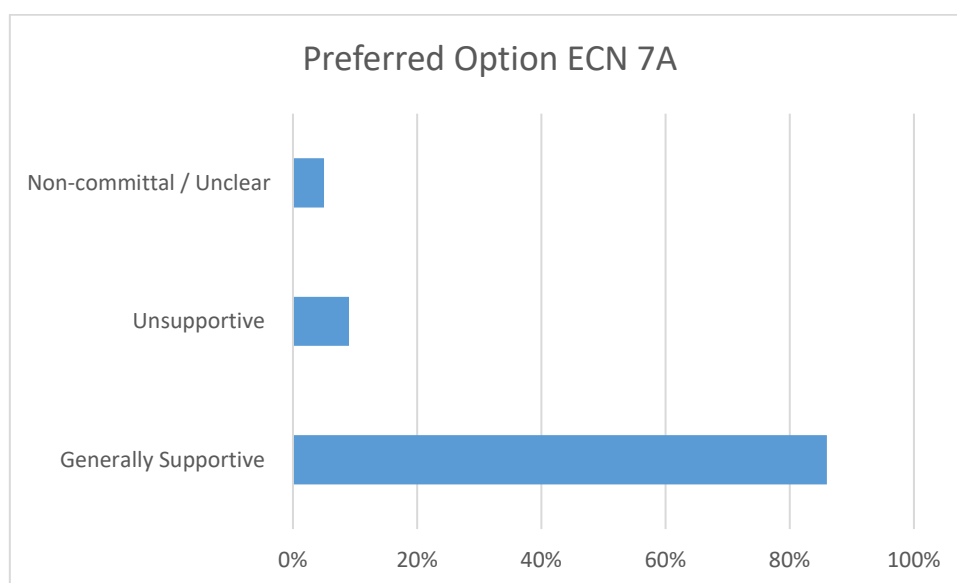
Promote town centres as first choice locations for a variety of complementary town centre uses to facilitate growth of the evening and night-time economy.

The preferred approach recommended the provision of a framework that would enable the Council to develop the Borough's evening and night-time economy through the promotion of the town centres as first choice locations for a range of cultural and community facilities, retail, leisure, entertainment and business uses.

Key Issue Response Rate: 10%

21 of the 201 representations received made comment in respect of Key Issue ECN 7 (Supporting the evening and night-time economy).

- 86% of the responses were generally supportive of the preferred approach;
- 9% of the responses were unsupportive of the preferred approach; and
- 5% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 7

There was a high level of support (86%) for the preferred approach to ECN 7. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

- The proposal to enhance evening regeneration is welcomed as it can rejuvenate under and/or unused heritage assets- this can provide a sense of cultural identity, authentic place and local character (POP ref 080).
- The preferred approach will enable town centres to respond to the challenges faced by the retail sector. Modern town centres need an offer more than retail to drive footfall and increase customer experience and expectation (POP ref 100).

- The range and type of uses must be diverse to appeal to the widest number of users and attract significant footfall. The centres should be the focus of administration, commercial, cultural, cultural, leisure, entertainment, arts and retail activity, so they are not limited to the daytime economy (POP ref 148).
- Developing the retail, cultural, leisure and recreational offer of the city and town centres will contribute to the growth of the night-time economy. City/town centre living can help to support the growth of the night-time economy by bringing more people into the centres, who can use facilities and services (POP ref 174).

One respondent, whilst supportive of the preferred approach, considered developing the night-time economy would require a more effective and arterial public transport system running into the evening and night. Also, the respondent highlighted that there would need to be an increase in accommodations for the increase in visitors and tourists, with Sunday trading hours and wider pedestrianisation (POP ref 147).

Critique of the preferred approach to Key Issue ECN 7

Only 9% (2 No.) of the responses were unsupportive of the preferred approach to ECN 7, one of which was confidential in nature. The other response did not agree that the promotion of the evening and night-time economies would assist in enhancing our town centres. The respondent considered that people generally go out in the evening for entertainment, and queried why cinemas, pubs and clubs should have to open in the town centre if an edge of town development would suit better (POP ref 004).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 7 'Supporting the evening and night-time economy', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The introduction of the Strategic Planning Policy Statement for Northern Ireland (SPPS) cancelled the publication of PPS 5: Retailing and Town Centres and as such a review of PPS 5 was not carried out.

One of the current operational policies relating to this Key Issue is Planning Policy Statement (PPS) 16: Tourism. The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Tourism in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances.

A more detailed review of PPS 16 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

We welcome the support and comments made in relation to the promotion of evening and night-time economies, which will be considered in advance of the Draft Plan Strategy. Customer experience and expectation are what will drive the prosperity of our town centres. In order to achieve this prosperity a diverse offering must be made available without compromising the services and function our town centres provide.

The review of our town centres will help to establish the nature and extent of the evening and night-time economy that is appropriate. The type of evening and night-time economy will evidently vary across our centres so to capitalize on unique characteristics and customer demand.

Preferred Option, for Key Issue ECN 8 (Facilitating Office Development (Class A2 Uses))

Option ECN 8A

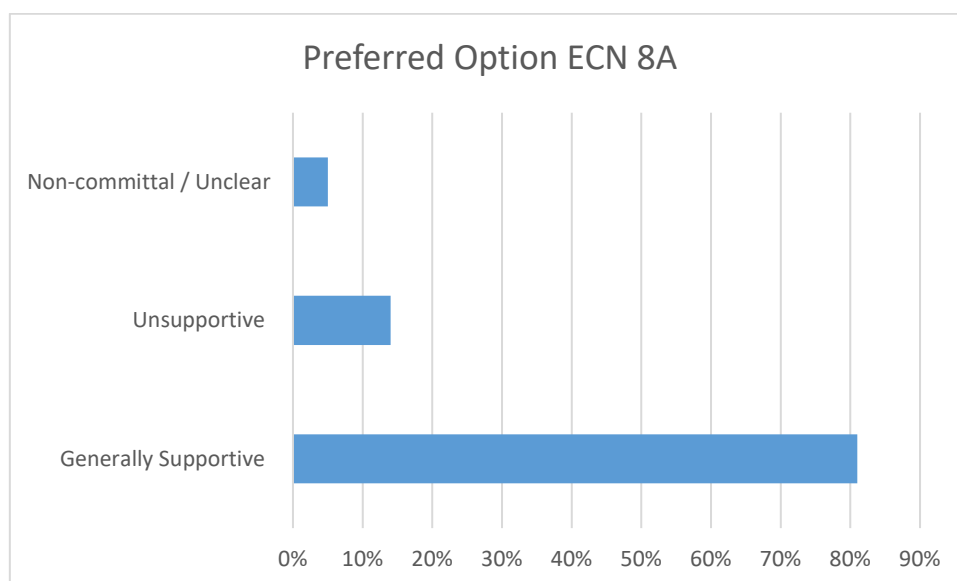
Bring forward a sequential approach towards Office Development (UCO Use Class A2: Financial, professional and other services) in town centres.

The preferred approach recommended the adoption of a sequential approach towards office use (UCO A2: Financial, professional and other services), which would require applications for office use to be considered in order of preference (town centre first, followed by edge of centre and then out of centre locations) so to ensure that the diversity of the town centres would be promoted. As opposed to restricting office development to town centres only, the preferred approach offered flexibility so to ensure that there would be opportunities for office development in circumstances where there is no appropriate site in the town centre.

Key Issue Response Rate: 10%

21 of the 201 representations received made comment in respect of Key Issue ECN 8 (Facilitating Office Development- Class A2 Uses).

- 81% of the responses were generally supportive of the preferred approach;
- 14% of the responses were unsupportive of the preferred approach; and
- 5% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 8

There was a high level of support (81%) for the preferred approach to ECN 8. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

- A sequential approach to Office development is reflective of the SPPS which aims to provide a degree of flexibility within town centres where there are no available, suitable or viable sites (POP ref 100).

- The LDP has an important role in facilitating and sustaining employment including an adequate provision of office accommodation in appropriate locations (POP ref 111).
- The preferred approach enables flexibility to be applied and the sequential approach safeguards town and city centres (POP ref 148).

One of the respondents acknowledged that the preferred approach complies with the regional strategic policy of the SPPS; however suggested that the Council should have cognisance of the interrelationship between the preferred option for facilitating office development and its proposals for economic growth (POP ref 113).

Critique of the preferred approach to Key Issue ECN 8

14% of respondents (3 No.) who submitted comments in respect of ECN 8 did not support the preferred approach. Some of the accompanying comments that were received are detailed below.

- Class A2; Financial, Professional and Other Services provide an appropriate scale of services that typically serve a local community in a local centre or in a district centre setting. The promotion of a sequential approach largely focussed on town centres at the expense of other district, local or village centres will be detrimental to the viability of these other centres as a whole. A sequential approach should only apply to instances whereby class A2 uses are proposed outside of any of the listed centres, whereby consideration should be given to if there is availability in the next nearest centre (POP ref 185).
- Local towns also need this type of development to help them flourish and continue to attract people to live and work there (POP ref 176).

One respondent advised that they completely disagree with the town centre first approach as businesses should not be restricted in where they can operate (POP ref 004).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 8 'Facilitating Office Development (Class A2 Uses)' however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The introduction of the Strategic Planning Policy Statement for Northern Ireland (SPPS) cancelled the publication of PPS 5: Retailing and Town Centres and as such a review of PPS 5 was not carried out.

Our comments

The sequential approach towards office development (UCO A2) reflects regional direction and the SPPS by promoting a town centre first approach and this will assist in enhancing the diversity of our centres. As such the overall support towards ECN 8A is welcomed. However, the Council will fully consider all comments, suggestions and constructive critique in advance of policy development for the draft Plan Strategy.

Preferred Option, for Key Issue ECN 9 (Identifying Development Opportunity Sites (DOSs))

Option ECN 9A

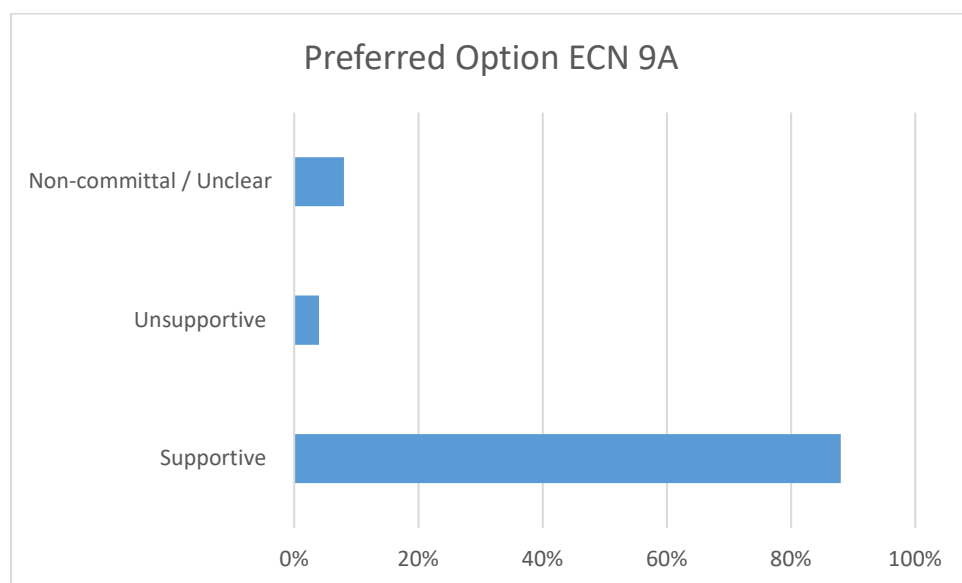
Review existing Development Opportunity Sites as designated, and identify new DOSs, where appropriate.

The preferred approach proposed a review of the current Development Opportunity Site designations (Lurgan, Portadown, Banbridge, Dromore, Gilford & Rathfriland) and the identification of additional sites, which may be underutilised or vacant and would benefit from redevelopment. The preferred approach sought to adopt a consistent approach towards Development Opportunity Sites across the Borough, by also considering possible Development Opportunity Sites within Central Craigavon, Armagh City and the Armagh Local Towns.

Key Issue Response Rate: 12%

25 of the 201 representations received made comment in respect of Key Issue ECN 9 (Identifying Development Opportunity Sites- DOSs).

- 88% of the responses were generally supportive of the preferred approach;
- 4% of the responses were unsupportive of the preferred approach; and
- 8% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 9

There was a high level of support (88% / 22 No.) for the preferred approach to ECN 9. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

- There is an opportunity for Development Opportunity Sites to help address the number of vacant buildings through adaptive reuse. The review of existing zonings against the historic environment baseline evidence is welcomed, so that this could be utilised to inform potential designation or Key Site Requirements (POP ref 080).

- The Council should ensure that where sites are identified, employment and offices are included amongst the uses set out within the Key Site Requirements (POP ref 111).
- It is considered appropriate that existing DOSs are reviewed, and new sites identified. However, only those which have a realistic possibility of delivery during the Plan period should be identified (POP ref 134).
- The preferred approach is both logical and sound. The review of the amount, size and location of future units can influence the future supply, so that a mix of floorspace can be provided in locations that would align with commercial profiles and requirements (POP ref 148).

One of the respondents, although they agreed with the preferred approach towards Development Opportunity Sites expressed some concern that development may be discouraged if Key Site Requirements are not flexible enough (POP ref 064).

Another of the respondents considered that the LDP should promote the development of vacant and under-utilised sites, highlighting that the development of such sites is important for increasing the vitality and vibrancy of the Centres. The respondent also requested that the Plan Strategy acknowledge housing as one of the potential suitable land uses on Development Opportunity Sites (POP ref 174).

Critique of the preferred approach to Key Issue ECN 9

Only 1 (4%) response was categorised as being unsupportive, however it did not substantiate or justify why the respondent disagreed with the preferred approach to ECN 9.

A small number (2 No.) of non-committal responses were received in respect of this Key Issue. Whilst these responses did not offer a specific opinion on the preferred approach, they made several comments and suggestions in respect of this Key Issue including:

- Adequate parking is required for the regeneration of centres (POP ref 006).
- Consideration of biodiversity constraints and an ecological assessment should be included in the identification of Development Opportunity Sites (POP ref 082).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 9 'Identifying Development Opportunity Sites DOSs' however made no additional comments.

Our comments

The overall support for the preferred approach to DOSs is welcomed, the Council will consider all suggestions and engage with key stakeholders in the identification of DOSs along with acceptable uses.

The review of the existing and proposed DOS sites at LPP stage will help ensure that there are adequate opportunities for regeneration within our centres.

Preferred Option, for Key Issue ECN 10 (Supporting sustainable tourism development)

Option ECN 10A

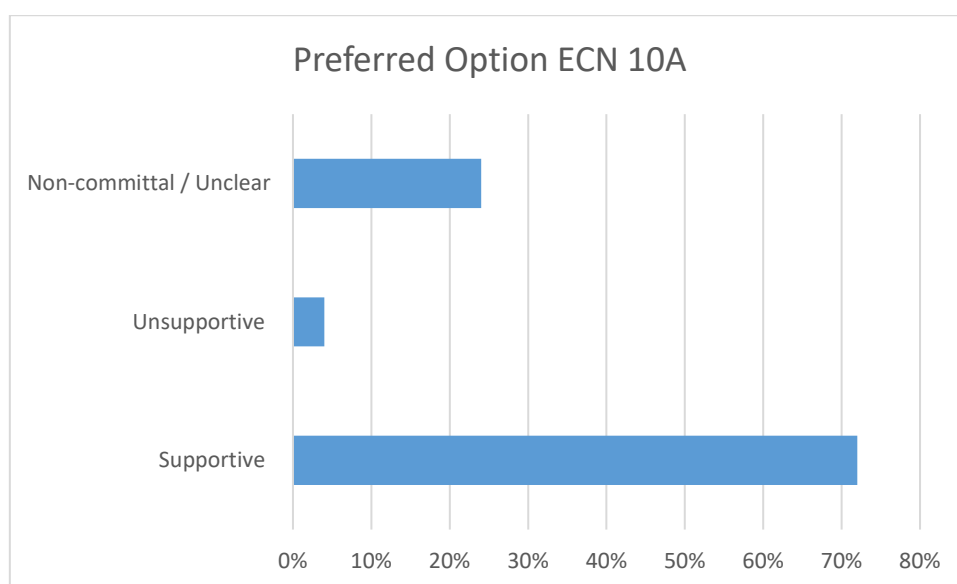
Carry forward an approach in line with existing policy and further regional direction to support and facilitate appropriate sustainable tourism development in both settlements and the countryside, with additions that are tailored to meet specific local tourism needs and protect tourism assets within the Borough.

The preferred approach recommended bringing forward policies in line with the current Tourism Policies (Planning Policy Statement (PPS) 16) but with some adjustment to reflect the Council's wider approach to the rural area under other key issues (e.g. rural economic development and design) and to build on the regional direction contained in the SPPS to best reflect local circumstances, where appropriate.

Key Issue Response Rate: 12%

25 of the 201 representations received made comment in respect of Key Issue ECN 10 (Supporting sustainable tourism development).

- 72% of the responses were generally supportive of the preferred approach;
- 4% of the responses were unsupportive of the preferred approach; and
- 24% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 10

There was a relatively high level of support for the preferred approach to Key Issue ECN 10, with 72% (18 No.) of the responses supportive of ECN 10A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- It is welcomed that unique tourism proposals will be required to demonstrate the exceptional benefit to the tourism industry (POP ref 079).

- The promotion of the historic environment and heritage assets as key tourism destinations is welcomed, exploiting the regions historic environment plays a decisive role in attracting outside investment. It is important that the approach towards the use and maintenance of heritage assets is sensitive, so to maintain the Boroughs distinctive historic environment character (POP ref 080).
- The delivery of tourism facilities is fundamental to the achievement of sustainable communities, as well as bringing economic benefits. In providing facilities within the Borough additional visitors are attracted to the district which supports its economic growth. The identification of land in suitable locations is important in ensuring that environmental assets are protected and will contribute towards the Borough's green infrastructure (POP ref 102).

One respondent, although supportive of the preferred approach highlighted that tourism development proposals must be analysed and rigorously assessed in order to protect our rural countryside which is constantly under development pressure (POP ref 001).

Another respondent, although supportive of the preferred approach, advocated a nodal approach to facilitating sustainable tourism through the designation of Tourism Opportunity Zones (TOZ's) and Tourism Conservation Zones (TCZ's) which would protect the more sensitive areas (POP ref 059).

One of the respondents suggested that the LDP should support and create significant tourism destinations and increase focus in outdoor activities, culture, arts, live music scene and sports. The respondent considered that this creates identity and vibrancy and gives people a purpose for travelling around and staying in the Borough. Therefore, the respondent advised that the LDP should support significant leisure and tourism destinations and the increase in arts, culture and sports projects, so that a mix of activities are available to enhance and encourage growth of both local and overseas visitors (POP ref 148).

Critique of the preferred approach to Key Issue ECN 10

Only 1 (4%) response was categorised as being unsupportive of the preferred approach to ECN 10. The respondent stated that they did not agree with preferred option in relation to sustainable tourism development, or the alternative option and considered that tourism should not block development or take funding away from infrastructure projects (POP ref 004).

Just under a quarter of the responses (24% / 6 No.) received in respect of ECN 10 were categorised as being non-committal or unclear. Whilst these responses did not offer a specific opinion on the preferred approach, they made several comments and suggestions in respect of this Key Issue including:

- There is a distinct lack of hotels in Armagh City, it is clear that further significant tourism accommodation is required in the city (POP ref 077).
- Proposals in the countryside should be subject to environmental assessment or, in the case of European sites, Habitats Regulation Assessment (POP ref 082).
- It is recommended that the Council gives due recognition of the contribution of existing and new forests and woodland to the tourism potential of the area (POP ref 126).

One of the respondents suggested that the LDP should steer tourism related development away from sensitive areas. The respondent considered that where the landscape is a core part of the tourism offering, all related tourism developments should be designed to be wholly sustainable and should not be at the expense of the area's natural assets. As such, the respondent suggested that cognisance to environmental considerations should form part of the policy wording to include a demonstration that there is no detrimental impact on biodiversity or on sensitive environmental areas and features (POP ref 135).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 10 'Supporting sustainable tourism development' and discussed how tourism may be further promoted in the Borough, including the Banbridge area, so to capitalise on the A1 (Belfast-Newry Road) and the F.E. Mc Williams Gallery. It was acknowledged that the Council needs to promote all tourism assets in the Borough.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this Key Issue is Planning Policy Statement (PPS) 16: Tourism.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Tourism in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include allowing for proposals beyond the periphery of a settlement limit, where a unique niche tourism market/attraction has been identified, in exceptional circumstances.

A more detailed review of PPS 16 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The overall support for the preferred approach to ECN 10 is welcomed. The Council will consider all comments and constructive advice as the approach to tourism is further developed. The Council acknowledges the linkages between tourism, the historic and natural environment and heritage assets which will be further explored as the LDP progresses, in particular the protection of important assets, biodiversity and sensitive landscapes.

Preferred Option, for Key Issue ECN 11 (Supporting sustainable minerals development)

Option ECN 11A

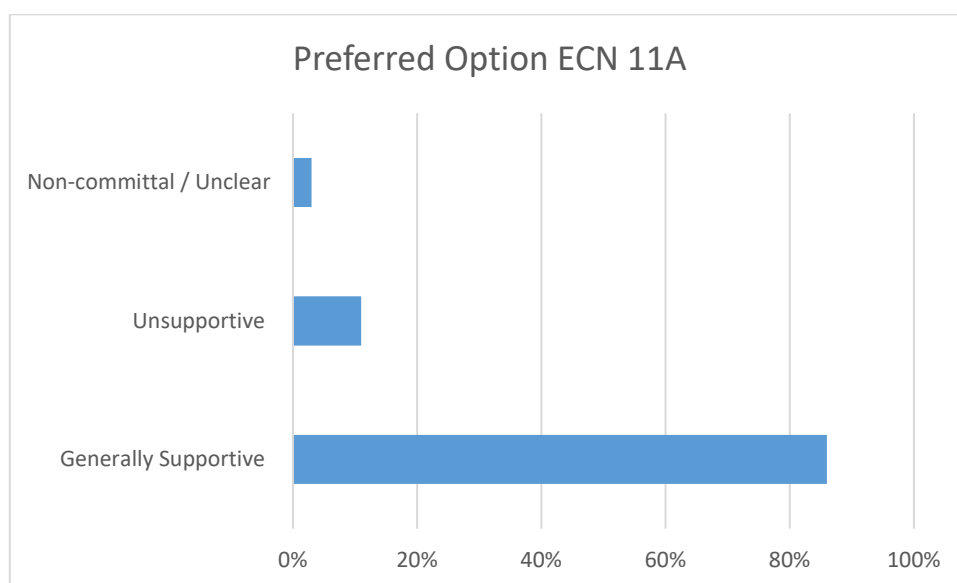
Support a balanced approach between the need for mineral resources and the need to protect the environment and other interests of acknowledged importance, in line with existing policies and further regional direction, by designating Mineral Safeguarding Zones (MSZs) and Areas of Constraint on Minerals Development (ACMDs) where appropriate.

The preferred approach recommended a locally tailored approach towards minerals development that would support the local supply chain in the long-term, but in a manner that would be sustainable and would minimise the negative impact on local communities. The preferred approach would allow for mineral reserves to be identified for exploitation; valuable resources to be safeguarded within designated Mineral Safeguarding Zones; and the Borough's most sensitive environments to be protected in designated Areas of Constraint on Minerals Development.

Key Issue Response Rate: 14%

28 of the 201 representations received made comment in respect of Key Issue ECN 11 (Supporting sustainable minerals development).

- 86% of the responses were generally supportive of the preferred approach;
- 11% of the responses were unsupportive of the preferred approach; and
- 3% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 11

There was a high level of support (86% / 24 No.) for the preferred approach to ECN 11. The following illustrates the wide range of comments that were received:

- The approach is in keeping with the SPPS and is essential in order to ensure the needs of the environment are adequately balanced against the need to realise the economic benefits which are associated with minerals development (POP ref 059).

- The recognition of the importance of the quarrying and mineral industry is welcomed. Aggregates and minerals extraction must be carried out in a responsible way that protects and enhances the local environment and minimises any impact on the amenity and well-being (POP ref 062).
- Existing quarries should be provided protection from incompatible development by the provision of mineral safeguarding zones, so to protect the future supply of aggregate to the local market and in support of the development needs identified in the LDP. Without protecting mineral resources, the ability to meet development needs will be adversely impacted upon (POP ref 061).
- The balance required between sustainable minerals development and protecting the environment is appreciated, however the minerals industry is subject to extensive regulatory controls and standards. Legitimate operators continually look to update and improve operations and appreciate the need to undertake activities in an environmentally sensitive and controlled manner (POP ref 078).
- The acknowledgement that extraction operations can have significant adverse impact on the historic environment is welcomed. The location and setting of heritage assets, including archaeology (known and unknown) should be considered when identifying Mineral Safeguarding Zones (MSZs) and Area of Constraint on Minerals Development (ACMDs) (POP ref 080).

One respondent, whilst supportive of the preferred approach, advised that it may have the unintended consequence of restricting Mineral Safeguarding Zones so tightly that they prevent exploration and mining activity in the future. The respondent explained that the precise extent of the area of deposits that are required to be safeguarded are currently uncertain and therefore it may not be possible to identify with any great precision, the Protection Zone that should be applied. As such the respondent suggested that the zones are drawn sufficiently wide to ensure that sites are not unduly restricted or sterilised in the future (POP ref 104).

Another respondent, who was supportive of the preferred approach, considered that areas with significant environmental designations should not be considered unless it can be demonstrated that there will be no harm and the area will be enhanced post development (POP ref 148).

One of the respondents highlighted that any intention to apply constraints on minerals development or indeed safeguarding areas must be supported by an accurate and reliable evidence base. The respondent acknowledged that although the information provided by DETI and QPANI is a starting point, it is not an acceptable measure of annual mineral outputs for the Borough, as not all minerals operators are members of QPANI (POP ref 177).

A number of the respondents offered suggestions and recommendations so to assist the Council in developing the approach towards Key Issue 11. The suggestions / recommendations included:

- Consultation with relevant bodies and key stakeholders in respect of minerals reserves, mineral workings (active, inactive and abandoned), related industries, constraints and areas of potential sterilisation;
- Recognition of the potential of future valuable mineral development;
- Engagement with local quarry operators to measure the supply and demand requirements;
- Assessment of the supply and demand requirements for aggregates within the Council area and also the supply and demand from other Council areas;
- Assessment of environmental considerations, economic benefits and options for mitigation;
- Engagement with key stakeholders to ensure policies and proposals adequately understand and appreciate the needs of the industry; and
- Consideration of the suitability of the road network required for the extraction of minerals, which should be cross referenced with road safety and traffic progression.

(POP refs 062, 078, 113)

Critique of the preferred approach to Key Issue ECN 11

11% (3 No.) of respondents who submitted comments in respect of ECN 11 did not support the preferred approach. Some of the accompanying comments that were received are detailed below.

- Sustaining economic growth should not be at the expense of the environment. All of the proposed options are perpetuating the myth of ‘the environment verses jobs’, this should not be the case if a truly integrated approach is taken to sustainable development (POP ref 135).
- The inclusion of sites within ACMDs will unduly restrict the operator and future growth. Removing ACMDs and allowing applications to be scrutinised at planning application stage will allow the operator to grow sustainably, grow the local economy, create employment and help to achieve the strategic objectives and vision of the LDP. There be a presumption in favour of mineral processing within areas of existing activity (implementation of a ‘Minerals Reserve Area’) and the sites should be explicitly identified in the Local Development Plan (POP ref 130).
- Protected areas and sensitive landscapes do not sit in isolation from the surrounding area. When identifying ACMDs consideration should also be given to including those species and habitats most at risk in terms of environmental impact and not just include areas of High Scenic Value for example Ramsar, SPA and ASSI designations (POP ref 135).
- The ACMD designation conflicts with the strategic objective of creating and maintaining conditions that provide for a dynamic, diverse and robust economy and which encourage existing and new businesses to invest; further constraint would have serious social and economic impact (POP ref 130).

One respondent was supportive of alternative option ECN 11C (a more restrictive minerals approach in the interests of the environment). The respondent stated that minerals are part of the land and as such are intimately bound up with non-mineral resources in and on the land. The respondent highlighted that there is a growing desire from the public to protect the countryside, parks, refuges, wildlife and endangered species habitats and other areas from mineral development and as such the more restrictions and scrutiny the better (POP ref 001).

One of the respondents considered that the preferred approach would not go far enough to sustain the levels of contribution or growth of the industry / protect existing sites and as such the options presented would require further revision to achieve a balanced approach to minerals. The respondent also highlighted that only protecting the minerals resource against surface development would either sterilise the mineral reserve or restrict its future extraction (POP ref 130).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 11 ‘Supporting sustainable minerals development’ however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. In the absence of a Planning Policy Statement, the Planning Strategy for Rural Northern Ireland provides the current operational planning policies for the control of minerals development.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to minerals in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include broadening criteria to include land stability and subsidence issues.

A more detailed review of PSRNI policies, in so far as they relate to minerals development, will be carried out in advance of the Plan Strategy.

Our comments

The generally supportive response to the Council's Preferred Option ECN 11A is welcomed. This recognises the need for minerals extraction and processing to support the local and wider economy, but not at the expense of the environment and other interests of acknowledged importance as far as possible. The majority of representations acknowledge the need for a balanced approach, as conveyed through the Council's preferred option. Careful consideration will be given to the broad range of interests represented and specific comments received, ahead of formulating the Borough's approach to minerals development in the Plan Strategy.

Further evidence gathering and engagement with consultation bodies and key stakeholders is required moving forward, to ensure that mineral policy development and related designations are informed by as an accurate and up-to-date picture of the Borough's mineral resources as possible, in addition to mineral workings, related industries, constraints and all other relevant considerations.

Preferred Option, for Key Issue ECN 12 (Facilitating sustainable infrastructure, telecommunications and utilities development to meet the needs of the Borough)

Option ECN 12A

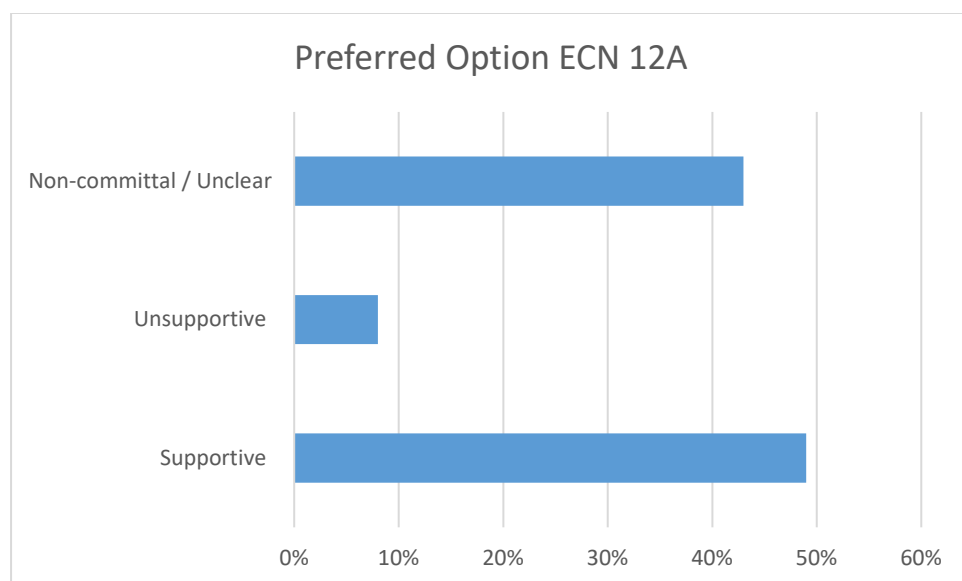
Providing a criteria-based policy in-line with existing policies and regional direction.

The preferred approach recommended bringing forward a criteria-based approach towards infrastructure, telecommunications and utilities development that is in line with the existing planning policies in PPS 10 (Telecommunications), PPS 11 (Waste Management), PPS 21 (re. non-mains sewerage) and PSRNI (PSU 8 and 11). However, the preferred approach recommended that the policy wording would be updated to reflect regional direction in the SPPS and ensure that such infrastructure is developed in an efficient and effective manner, whilst keeping the environmental impact to a minimum.

Key Issue Response Rate: 17%

35 of the 201 representations received made comment in respect of Key Issue ECN 12 (Facilitating sustainable infrastructure, telecommunications and utilities development to meet the needs of the Borough).

- 49% of the responses were generally supportive of the preferred approach;
- 8% of the responses were unsupportive of the preferred approach; and
- 43% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 12

Almost half (49%) of the responses received in respect of ECN 12 were supportive of the preferred approach. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- There is a need for Local Development Plans to respond to recent technological advances in sustainable infrastructure, telecommunications and utilities development (POP ref 179).
- As quarrying is a rurally based industry many operators face challenges created by poor broadband coverage, therefore any initiative by the Council to improve the provision services for rural business and communities is welcomed (POP ref 062).
- Local towns need the benefit of improved infrastructure, telecommunications and utilities development (POP ref 176).

One of the respondents, whilst supportive of the preferred approach towards infrastructure, telecommunications and utilities development, suggested that there should be some protection for Local Landscape Policy (LLPAs) or (ATCs), so to help protect them from development of telecoms masts or other infrastructure schemes that may impact on these areas (POP ref 064).

Critique of the preferred approach to Key Issue ECN 12

8% (3 No.) of the respondents who submitted comments in respect of ECN 12 did not support the preferred approach. One of the respondents stated that measures must be in place to stop the destruction of sites of cultural significance, and to reduce and minimise the impact on both the landscape and the people who live within it (POP ref 002).

Another of the respondents, although supportive of the principle of avoiding areas of high landscape sensitivity, advised that it may not always be possible to avoid sensitive locations because of the nature of generator and demand locations. Therefore, the respondent considered that policy wording should be amended to state that areas of landscape sensitivity be avoided *where possible* and not just a policy to reflect the SPPS (POP ref 099).

Almost half of the responses (43% / 15 No.) received in respect of ECN 12 were categorised as being non-committal or unclear. Whilst these responses did not offer a specific opinion on the preferred approach, they made several comments in respect of this Key Issue including:

- There is a need to consider the protection of historic environment features, as well as the settings of individual and linked / connected heritage assets and their settings, from inappropriately sited infrastructure developments (POP ref 080).
- The Councils desired growth over the plan period will require the enhancement of the water and sewerage infrastructure and wastewater treatment facilities within the Borough. The Councils close working relationship with NI Water will help to determine locations where new / upgraded WWTWs may be needed to accommodate current and future demand but not at the detriment of the environment or amenity (POP ref 113).
- The Council's research into the specific issue of rural broadband is welcomed. Future investment in broadband must prioritise areas that have the weakest internet access on the basis of objective need, the Council should investigate community schemes in response to poor broadband and were found to be viable should support such schemes (POP ref 125).
- As part of the integrated approach which the Local Development Plan is seeking to advocate, early dialogue with other utility providers could lead to a co-ordinated effort in areas where infrastructure is proposed, thereby helping transform the area and its natural heritage / tourism potential for the future. Sensitive landscapes must include references to species and habitats (POP ref 135).

9 No. of the responses that were categorised as non-committal were received from Electronic Communication Code / Gas Licensees. These responses did not provide specific comment in respect of ECN 12A, however provided information relating to the Licensees assets, network or apparatus in the Borough.

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 12 'Facilitating sustainable infrastructure, telecommunications and utilities development to meet the needs of the Borough' however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this Key Issue is Planning Policy Statement (PPS) 10: Telecommunications (note: Policy TEL 2 is cancelled).

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Telecommunications in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include providing a policy framework that will support investment so that rural broadband deficiencies can be addressed.

A more detailed review of PPS 10 will be carried out in advance of the Plan Strategy.

Also note that the following operational planning policies are relevant to this Key Issue:

- The Planning Strategy for Rural Northern Ireland (PSRNI), in particular Policy PSU 8 'New Infrastructure' and PSU 11 'Overhead Cables';
- Planning Policy Statement (PPS) 11: Planning and Waste Management; and
- Planning Policy Statement 21 (PPS 21): Development in the Countryside in particular Policy CTY 16)

These policies will be reviewed in greater detail in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will be further explored.

Our comments

The overall support for the preferred approach to ECN12 is welcomed.

The Council will fully consider, with further evidence gathering as required, the constructive advice and suggestions raised in the representations in advance of the Draft Plan Strategy. The relationship between ECN 12 and the historic /natural/ cultural environment and heritage assets will be further considered and explained as the LDP progresses; including the cumulative impact on the setting of such landscapes / environments/ assets and how they may be protected / mitigated.

The Council will continue to work with key consultees and stakeholders in developing a balanced strategic policy for infrastructure, telecommunications and utilities development.

Preferred Option, for Key Issue ECN 13 (Protecting the Borough's Protected Routes)

Option ECN 13A

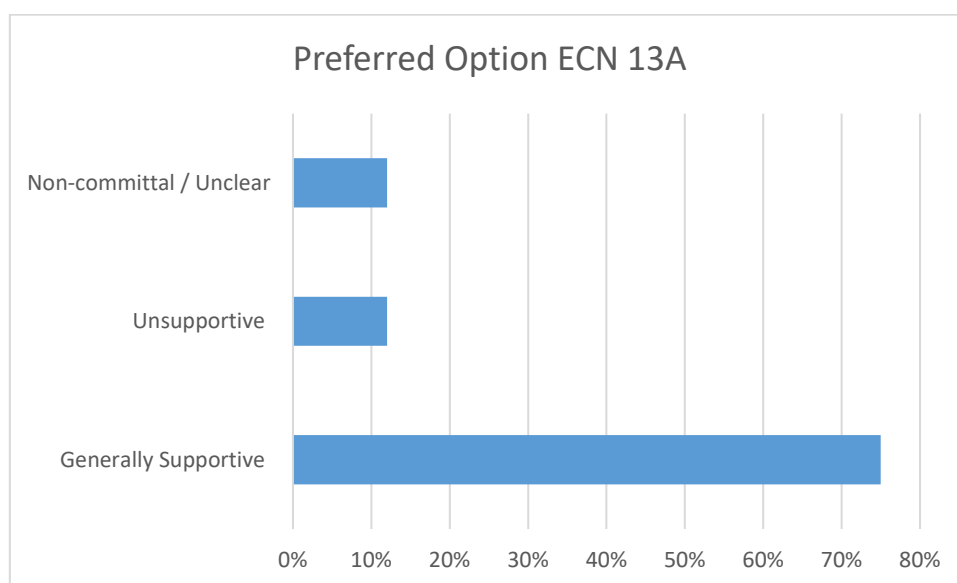
Bringing forward an approach that is in line with existing Protected Routes policy, tailored to the needs of the Borough.

The preferred approach recommended restricting the number of new accesses and controlling the level of use of existing accesses onto protected routes whilst also providing an opportunity to tailor the policy to meet the specific needs of the Borough by acknowledging that in some cases a new access onto a protected route is necessary.

Key Issue Response Rate: 12%

24 of the 201 representations received made comment in respect of Key Issue ECN 13 (Protecting the Borough's Protected Routes).

- 75% of the responses were generally supportive of the preferred approach;
- 12.5% of the responses were unsupportive of the preferred approach; and
- 12.5% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 13

There was a relatively high level of support for the preferred approach to Key Issue ECN 13, with three quarters (75% / 18 No.) of the responses supportive of ECN 13A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- The importance of the protected routes and future development along them are fundamental to ensure growth within the Borough. The preferred approach retains significant flexibility, whilst safeguarding the existing strategic road network (POP ref 148).
- If the preferred approach is carried out correctly then the infrastructural needs of Armagh should be addressed (POP ref 147).
- The preferred approach will ensure that protected routes are not compromised, whilst at the same time allowing access to residential development (POP ref 123).

One respondent referred to the A29 corridor which runs through the Borough and Mid Ulster and were supportive of the need to limit new accesses to this protected route in line with existing policy, whilst also seeing the need to tailor the policy for specific requirements. The respondent also highlighted that although there are no planned upcoming improvements to A29 they would be supportive of any such projects were they to come to the fore throughout the Plan Period (POP ref 059).

Critique of the preferred approach to Key Issue ECN 13

12.5% (3 No.) of the respondents who submitted comments in respect of ECN 13 did not support the preferred approach. One of respondents advised that they would caution against any departure from current regional policy relating to protected routes and suggested that any amendment of policy must ensure the safety of users and efficient flow of traffic movement is not compromised (POP ref 174).

1No. of the responses stated that they were supportive of ECN 13B which suggested a stricter protected routes policy than the existing policy approach (POP ref 004), however the respondent did not offer any explanation / additional information to justify their opinion.

12.5% (3 No.) of the responses received in respect of ECN 13 were categorised as being non-committal or unclear. Whilst these responses did not offer a specific opinion on the preferred approach, they made several comments in respect of this Key Issue including:

- Where existing or proposed protected routes encompass or are adjacent to heritage assets and their setting any proposal should have a heritage led approach. For example, historic evidence should be used to consider if new openings are appropriate in the historic context and be in compliance with any statutory provisions (POP ref 080).
- There is a potential impact on biodiversity from protected routes, such as the Protected Road Line, as identified in the Craigavon Area Plan 2010 between the North and South Lake in Central Craigavon which has the potential to have an adverse effect on Priority Species such as the Cryptic Wood White butterfly which has a stronghold in this area. Conversely, there is also the opportunity for biodiversity gain with any well-planned road schemes (POP ref 082).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 13 'Protecting the Boroughs Protected Routes' however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are:

- Planning Policy Statement (PPS) 3: Access Movement, Parking;
- Planning Policy Statement (PPS) 3 (Clarification): Access Movement and Parking; and
- Planning Policy Statement (PPS) 13: Transportation and Land Use

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Access, Movement and Parking in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include:

- Exceptions within Protected Routes Policy;
- Identification and safeguarding of Key Strategic Road Improvement Schemes;
- Introduction of a consistent approach towards disused transport routes across the Borough.
- Identification of new Park and Ride / Park and Share sites and the review existing sites.

- The requirement of all new development within urban areas to demonstrate that active travel networks and sustainable transport have been incorporated within the scheme.

A more detailed review of PPS 3 (and clarification) and PPS 13 will be carried out in advance of the Plan Strategy.

Also note that the following operational planning policies are relevant to this Key Issue:

- Planning Policy Statement (PPS) 7: Quality Residential Environments Policy QD 1 (Criterion e); and
- Planning Policy Statement 21 (PPS 21): Development in the Annex 1 of PPS 21 provides a consequential amendment to Policy AMP 3 'Access to Protected Routes' of PPS 3.

These policies will also be reviewed in greater detail in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will be further explored.

Our comments

The overall support and comments made in relation to the preferred option are welcomed and will be taken into consideration during the next stage of the plan process.

The Council will liaise with the Department for Infrastructure (DfI) and other relevant stakeholders, as appropriate, when developing the policy approach towards protected routes, so that they are capable of meeting the specific needs of the Borough whilst ensuring that their function is not compromised.

Inevitably this will involve greater integration between land use and transportation planning in order to identify where stricter or more relaxed approaches may be appropriate.

Preferred Option, for Key Issue ECN 14 (Protecting proposed Strategic Road Improvement Schemes)

Option ECN 14A

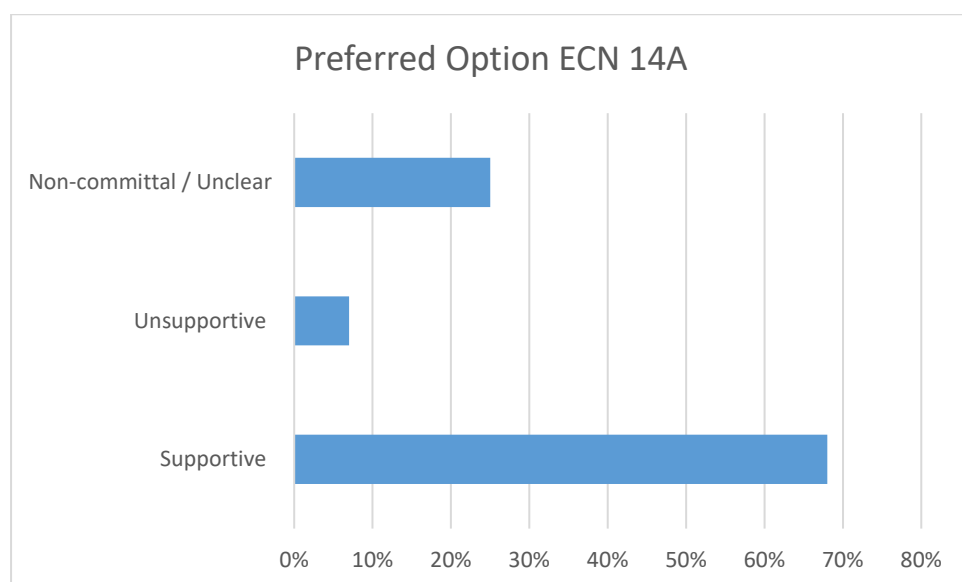
Identify and safeguard Key Strategic Road Improvement Schemes in the LDP to enhance accessibility within the Borough.

The preferred approach recommended that the LDP protects land from development that is required to facilitate long term Strategic Road Improvement Schemes to ensure that future implementation of the project is not jeopardised.

Key Issue Response Rate: 14%

28 of the 201 representations received made comment in respect of Key Issue ECN 14 (Protecting proposed Strategic Road Improvement Schemes).

- 68% of the responses were generally supportive of the preferred approach;
- 7% of the responses were unsupportive of the preferred approach; and
- 25% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 14

68% (19 No.) of respondents were supportive of the preferred approach to ECN 14. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- The Plan should identify a wider range of future transport infrastructure projects. This should include defining locations for urban transport hubs and showing the routes of secondary road links through and around the larger settlements so to ensure settlements do not grow in a piecemeal fashion through a succession of housing developments, instead there should be a longer term vision of how each place will grow, with each development playing its part (POP ref 180).
- The LDP should make use of the planned infrastructure improvements for the benefit of the entire Borough and strengthen cross border links (POP ref 148).

One respondent, who broadly agreed with the preferred approach towards the protection of key Strategic Road Improvement Schemes within the Borough, suggested that locally identified policy areas or character areas should be considered in relation to the value of a scheme against the harm it may result in (POP ref 064).

Another respondent, who was supportive of the preferred approach, suggested that the Armagh North and West Link Road should be included in the final Local Development Plan as it would provide a suitable and natural feature to act as a new settlement limit (POP ref 077).

Critique of the preferred approach to Key Issue ECN 14

Only 7% (2No.) of the responses received in respect of ECN 14 were categorised as being unsupportive of the preferred approach. One respondent disagreed with the preferred approach as they considered that wider, more accessible roads would result in more traffic as it would be more convenient for people to use these rather than move to public transport which has the capacity to take cars off the road (POP ref 001). Another respondent highlighted that Armagh does not have a bypass road and believed this is resulting in severe congestion issues in the City. The respondent considered that there is no sense having a tourist masterplan if tourists cannot access the City without having to endure a 'nightmare' journey (POP ref 004).

One quarter of the responses (25% / 7 No.) received in respect of ECN 14 were categorised as being non-committal or unclear. Whilst these responses did not offer a specific opinion on the preferred approach, they made a number of comments in respect of this Key Issue including:

- The development of new schemes should have a heritage led approach where they encompass or are adjacent to heritage assets and their settings. Historic evidence should be used to consider if new routes are appropriate in the historic context and are in compliance with any statutory provisions on protected heritage assets (POP ref 080).
- The Council should include a Strategic Road Improvement Scheme or a new road between Craigavon and the A1 which is the main North South economic highway. Such a road would minimise the number and frequency of HGV travelling through residential areas, villages and small settlements as well as improving connectivity of cross border trade (POP ref 125).
- There needs to be a linked-up and co-ordinated approach to addressing strategic infrastructure issues in the Borough – for example with transport and accessibility; this should assist in achieving sustainable forms of development (POP ref 135).
- The Armagh North link, West Link and East Link projects must be prioritised to address serious congestion as well as enhancing accessibility to the main gateways and cross border links along the key network (POP ref 147).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 14 'Protecting proposed Strategic Road Improvement Schemes' and highlighted the importance of liaising with the Department for Infrastructure in relation to the status of local road schemes and other infrastructure works.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are:

- Planning Policy Statement (PPS) 3: Access Movement, Parking;
- Planning Policy Statement (PPS) 3 (Clarification): Access Movement and Parking; and
- Planning Policy Statement (PPS) 13: Transportation and Land Use

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Access, Movement and Parking in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include:

- Exceptions within Protected Routes Policy;
- Identification and safeguarding of Key Strategic Road Improvement Schemes;
- Introduction of a consistent approach towards disused transport routes across the Borough.
- Identification of new Park and Ride / Park and Share sites and the review existing sites.
- The requirement of all new development within urban areas to demonstrate that active travel networks and sustainable transport have been incorporated within the scheme.

A more detailed review of PPS 3 (and clarification) and PPS 13 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The support and constructive comments made in relation to the preferred option are welcomed and will be taken into consideration during the next stage of the plan process. Regional direction in respect of Strategic Road Improvement Schemes is clear, acknowledging that they are essential for delivering a modern, safe and sustainable transport system for Northern Ireland. The Council acknowledges that the potential impact of Strategic Road Improvement schemes on the natural and historic environment needs to be fully considered and mitigated against.

Preferred Option, for Key Issue ECN 15 (Protecting the Borough's Disused Transport Routes)

Option ECN 15A

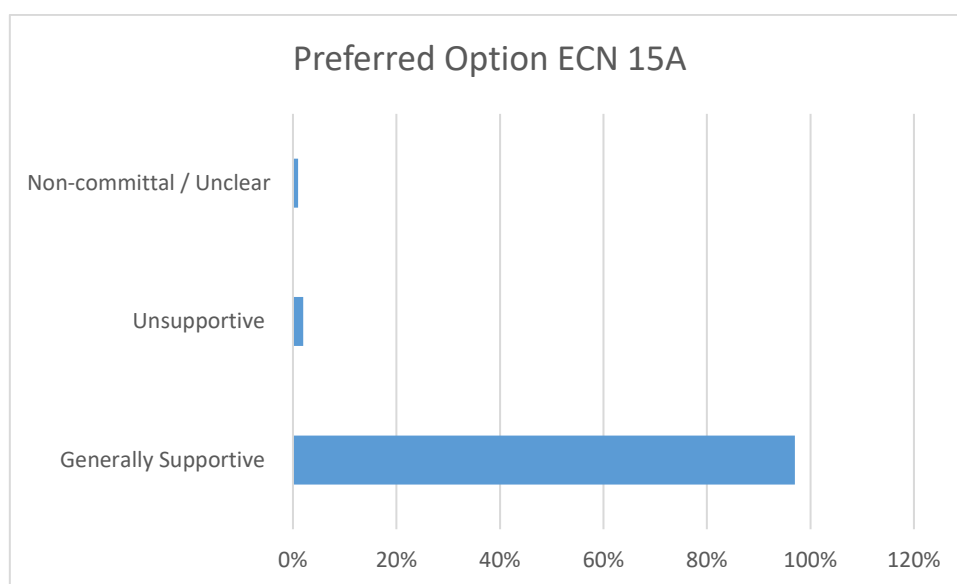
Protect disused transport routes in line with existing policy and identify and safeguard routes in the LDP that have a reasonable prospect of becoming useable in the future.

The preferred option recommended the introduction of a consistent approach towards disused transport routes across the Borough, through identifying and safeguarding all routes in the LDP that have a reasonable prospect of becoming useable in the future. In instances where there is no reasonable prospect of the reuse of such routes for future transport purposes, the preferred approach recommended that consideration could be given to protecting routes for appropriate alternative purposes such as recreational, nature conservation or tourism related uses.

Key Issue Response Rate: 47%

94 of the 201 representations received made comment in respect of Key Issue ECN 15 (Protecting the Borough's Disused Transport Routes).

- 97% of the responses were generally supportive of the preferred approach;
- 2% of the responses were unsupportive of the preferred approach; and
- 1% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 15

There was a very high level of support for the preferred approach to ECN 15, with 97% (91 No.) of the respondents supportive of ECN 15A. ECN 15 also had the highest response rate of all Key Issues presented in the POP, with almost half of all respondents (47%) referring to this Key Issue in their response.

Most of the respondents who were supportive of the preferred approach made a specific request for the safeguarding of the Armagh Portadown Railway, highlighting that people in Armagh are feeling disadvantaged by being deprived of this transport option. Another respondent suggested that the Lagan Canal should be protected by the LDP (POP ref 127).

One of the respondents highlighted that the protection of existing disused transport routes enables the provision of green infrastructure and community space, which is critical in promoting active travel and providing a shared space. Furthermore, the respondent suggested that opportunities for leisure and tourism should be evaluated, upgraded and expanded as part of the plan process (POP ref 148).

One respondent, who was supportive of the preferred approach, highlighted the need to demonstrate how the historic environment evidence has been used and how heritage assets have been considered in relation to how potential facilities along these routes are located. Disused structures associated with canals, towpaths, rail works and so on themselves may be protected or have historic or architectural interest, as such there is a need to consider how these structures could be utilised and conserved (POP ref 080).

Another respondent suggested that ECN 15, 17 (Promoting active travel and sustainable transport) and 18 (Promoting and enhancing access to greenways) should be used to develop a network of active travel routes within the Council Area, a network that would be a real and practical alternative to routes which are dominated by motor traffic. This would ensure that development of active travel routes within new development would link with routes outside those developments in order to deliver a coherent functional network rather than fragments (POP ref 113).

One of the respondents, although supportive of the preferred approach, highlighted that what may be considered a 'reasonable prospect' of reopening could be difficult to define (POP ref 177).

Critique of the preferred approach to Key Issue ECN 15

Only 2% (2 No.) of the responses received in respect of ECN 15 were categorised as being unsupportive of the preferred approach. One respondent considered that only protecting those which have a reasonable prospect of becoming useable in the future is highly subjective and potentially subject to change over time. The respondent added that once lost, these disused routes can no longer be reclaimed, and therefore their protection should therefore be maintained within the LDP (POP ref 135). The other respondent who disagreed with the preferred approach suggested that greater onus should be placed on bringing disused routes back into use, particularly for walking, leisure and recreational purposes. The respondent also highlighted that there may be occasions where bringing the land into a development proposal may offer significant benefits such as improved safety, environmental improvements and access requirements (POP ref 185).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 15 'Protecting the Boroughs Disused Transport Routes', in particular the significant level of support for the preferred approach.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are:

- Planning Policy Statement (PPS) 3: Access Movement, Parking;
- Planning Policy Statement (PPS) 3 (Clarification): Access Movement and Parking; and
- Planning Policy Statement (PPS) 13: Transportation and Land Use

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Access, Movement and Parking in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include:

- Exceptions within Protected Routes Policy;
- Identification and safeguarding of Key Strategic Road Improvement Schemes;
- Introduction of a consistent approach towards disused transport routes across the Borough.
- Identification of new Park and Ride / Park and Share sites and the review existing sites.
- The requirement of all new development within urban areas to demonstrate that active travel networks and sustainable transport have been incorporated within the scheme.

A more detailed review of PPS 3 (and clarification) and PPS 13 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The Council welcomes the very strong support for the preferred option. All constructive advice and comments will be considered as the LDP progresses in order to inform policy development in line with regional direction.

Preferred Option, for Key Issue ECN 16 (Protecting key Park and Ride sites)

Option ECN 16A

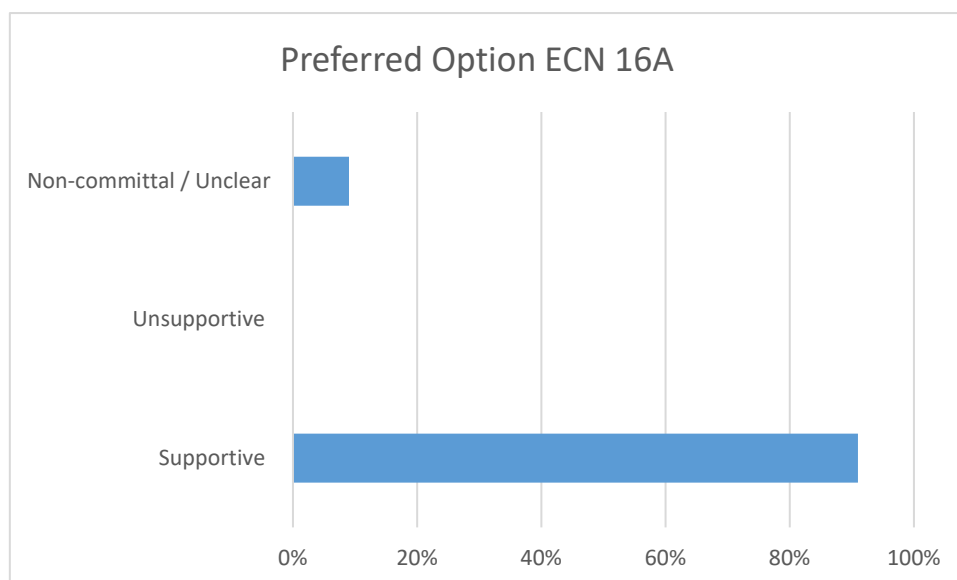
Protect existing and proposed key Park and Ride sites and identify and safeguard potential new Park and Ride/ Park and Share sites within the Borough.

The preferred approach recommended the protection of Key Park and Ride sites across the Borough as an effective measure to help address congestion and reduce private car dependency and also the identification of new Park and Ride or Park and Share sites in viable locations where demand exists.

Key Issue Response Rate: 11%

23 of the 201 representations received made comment in respect of Key Issue ECN 16 (Protecting key Park and Ride sites).

- 91% of the responses were generally supportive of the preferred approach;
- 0% of the responses were unsupportive of the preferred approach; and
- 9% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 16

There was a high level of support for the preferred approach to Key Issue ECN 16, with 91% (21 No.) of the responses supportive of ECN 16A. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

One of the respondents welcomed the approach however highlighted that there is a need to demonstrate how historic evidence has been used and how heritage assets have been considered in relation to where potential facilities are located. Furthermore, the respondent suggested that Key Site Requirements should include provision for archaeological assessment (POP ref 080).

Another respondent offered no objection to the reduction in number and length of journeys by private car, providing the identification of any new site adopts an environmentally sustainable approach, and does not result in the loss or impact on any site sensitive area (habitats and species) (POP ref 135).

One respondent suggested that existing park and ride facilities should be maintained and new sites identified in conjunction with the joined up approach to employment, as the clustering of businesses and services at strategic locations on the transport network is critical in encouraging linked trips, car sharing and park and ride facilities (POP ref 148).

One of the respondents acknowledged that reduction in reliance upon the private car contributes to the reduction of greenhouse gases and promotes active lifestyles, which are key aims in the SPPS. The respondent considered that park and ride facilities would help to enable more sustainable travel patterns, however the LDP should support this aim by providing improved and linked infrastructure, such as cycle ways and walkways, which integrate with public transport halts. The respondent suggested that further development of infrastructure will improve passengers' experience, making public transport a more attractive travel choice for residents and visitors within the council area, consequently increasing journeys by bus and rail (POP ref 174).

Critique of the preferred approach to Key Issue ECN 16

None of the responses received in respect of ECN 16 were unsupportive of the preferred approach. However, 9% (2 No.) of the responses were categorised as being non-committal or unclear. Whilst these responses did not offer a specific opinion on the preferred approach, they made a number of comments and suggestions in respect of this Key Issue including:

- Roads and their associated infrastructure may have significant environmental effects on local biodiversity, for example through lighting. Conversely, there is also the opportunity for biodiversity gain with any well-planned road schemes (POP ref 082).
- Flood risk must be considered for any park and ride facility- such development should not be sites in areas prone to flooding (POP ref 113).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 16 'Protecting key Park and Ride Sites' however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are:

- Planning Policy Statement (PPS) 3: Access Movement, Parking;
- Planning Policy Statement (PPS) 3 (Clarification): Access Movement and Parking; and
- Planning Policy Statement (PPS) 13: Transportation and Land Use

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Access, Movement and Parking in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include:

- Exceptions within Protected Routes Policy;
- Identification and safeguarding of Key Strategic Road Improvement Schemes;

- Introduction of a consistent approach towards disused transport routes across the Borough.
- Identification of new Park and Ride / Park and Share sites and the review existing sites.
- The requirement of all new development within urban areas to demonstrate that active travel networks and sustainable transport have been incorporated within the scheme.

A more detailed review of PPS 3 (and clarification) and PPS 13 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The support given to the preferred option is welcomed.

The Council will fully consider the constructive advice and suggestions raised in the representations in advance of the Draft Plan Strategy, with further evidence gathering as required. The linkages between ECN 16 and other key issues, such as ECN 17 (Promoting Active Travel and Sustainable Transport), will be further explored and considered.

Preferred Option, for Key Issue ECN 17 (Promoting Active Travel and Sustainable Transport)

Option ECN 17A

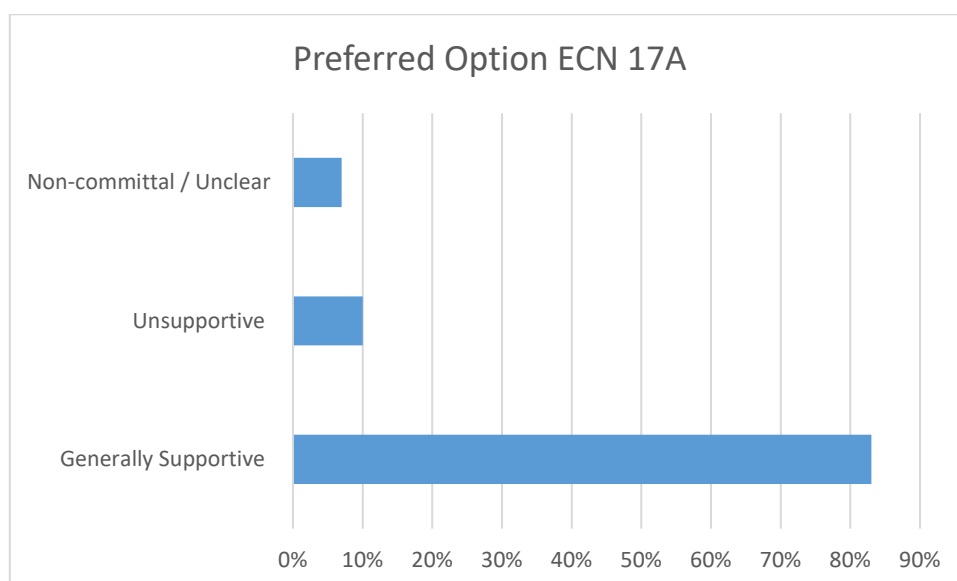
Promote active travel networks and sustainable transport in all new development within settlements to demonstrate accessibility to and integration with existing public transport, walking and cycling networks.

The preferred approach recommended the introduction of a general policy requiring all new development, irrespective of the nature of the development, within urban areas to demonstrate that active travel networks and sustainable transport have been incorporated within the scheme. Whilst the new policy would be similar to those contained in the existing suite of operational policies, the preferred approach recommended a more stringent test, with a greater responsibility on the developer to demonstrate the consideration given to promoting active travel.

Key Issue Response Rate: 14%

29 of the 201 representations received made comment in respect of Key Issue ECN 17 (Promoting Active Travel and Sustainable Transport).

- 83% of the responses were generally supportive of the preferred approach;
- 10% of the responses were unsupportive of the preferred approach; and
- 7% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 17

There was a high level of support for the preferred approach to Key Issue ECN 17, with 83% (24 No.) of the responses supportive of ECN 17A. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

- The preferred approach provides an excellent opportunity to develop a significant Greenway network within the Borough (POP ref 109).

- The provision of green infrastructure is critical in promoting active travel and providing a shared space; defined walking routes and positive use of inland waterways creates opportunities for leisure and tourism and should be evaluated, upgraded and expanded as part of the plan process (POP ref 148).
- Residential development that reduces car dominance in local streets encourage pedestrian and cycle journeys and make it safer for children to walk to school and play outside, should be promoted (POP ref 174).

One of the respondents, who were supportive of the preferred approach, considered that it would be beneficial if the developers also had a duty on the largest developments to provide further links if none are available in the area (POP ref 064).

Another respondent suggested that ECN 17, 15 (Protecting the Borough's disused transport routes) and 18 (Promoting and enhancing access to greenways) should be used to develop a network of active travel routes within the Council Area, a network that would be a real and practical alternative to routes which are dominated by motor traffic. The respondent highlighted that this would ensure that development of active travel routes within new development would link with routes outside those developments in order to deliver a coherent functional network rather than fragments (POP ref 113).

One of the respondents was supportive of preferred approach, but only where it is reasonable and practical as many development sites are not well served by public transport and there may be no reasonable prospect of providing pedestrian/cycling connectivity (POP ref 177).

Whilst one of the respondents agreed with the preferred approach, they considered that the policy could go further by introducing Areas of Parking Restraint in highly accessible locations such as town centres and arterial transport routes, train halts etc. The respondent considered that this would encourage higher density development, promote urban regeneration along main routes and help to realise a modal shift in transport (POP ref 185).

Critique of the preferred approach to Key Issue ECN 17

10% (3 No.) of the respondents who submitted comments in respect of ECN 17 did not support the preferred approach. One of the respondents, who was unsupportive of the preferred approach, considered that it is not the developer's responsibility to make people cycle or walk (POP ref 004). Another respondent did not agree that developers should be required to demonstrate that new development is integrated with more sustainable modes of travel, adding that if developer contributions were permitted, this approach would amount to a "fee for development" to the developer (POP ref 188).

7% (2 No.) of the responses received in respect of ECN 17 were categorised as being non-committal. Whilst these responses did not offer a specific opinion on the preferred approach, they made a few comments and suggestions in respect of this Key Issue including:

- Appropriate evaluation of schemes is necessary to ensure the historic environment and heritage assets are appropriately considered (POP ref 080).
- Infrastructure may have significant environmental effects on local biodiversity, conversely, there is also the opportunity for biodiversity gain (POP ref 082).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 17 'Promoting Active Travel and Sustainable Travel' however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are:

- Planning Policy Statement (PPS) 3: Access Movement, Parking;
- Planning Policy Statement (PPS) 3 (Clarification): Access Movement and Parking; and
- Planning Policy Statement (PPS) 13: Transportation and Land Use

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Access, Movement and Parking in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include:

- Exceptions within Protected Routes Policy;
- Identification and safeguarding of Key Strategic Road Improvement Schemes;
- Introduction of a consistent approach towards disused transport routes across the Borough.
- Identification of new Park and Ride / Park and Share sites and the review existing sites.
- The requirement of all new development within urban areas to demonstrate that active travel networks and sustainable transport have been incorporated within the scheme.

A more detailed review of PPS 3 (and clarification) and PPS 13 will be carried out in advance of the Plan Strategy.

Also note that Planning Policy Statement (PPS) 7: Quality Residential Environments Policy QD 1 (Criterion e relates to sustainable movement patterns in housing layouts) is also relevant to this Key Issue. This policy will also be reviewed in greater detail in advance of the Plan Strategy at which stage cross-cutting issues with other relevant topics will be further explored.

Our comments

The Council welcomes the support and comments received in relation to the preferred approach to the promotion of active travel and sustainable transport.

Council acknowledges the role of the LDP in facilitating and promoting active travel and sustainable transport across the Borough.

In advance of the draft Plan Strategy the Council will work with relevant key consultees in developing a proactive policy to promote active travel and sustainable transport in all new development within settlements.

Preferred Option, for Key Issue ECN 18 (Promoting and enhancing access to greenways)

Option ECN 18A

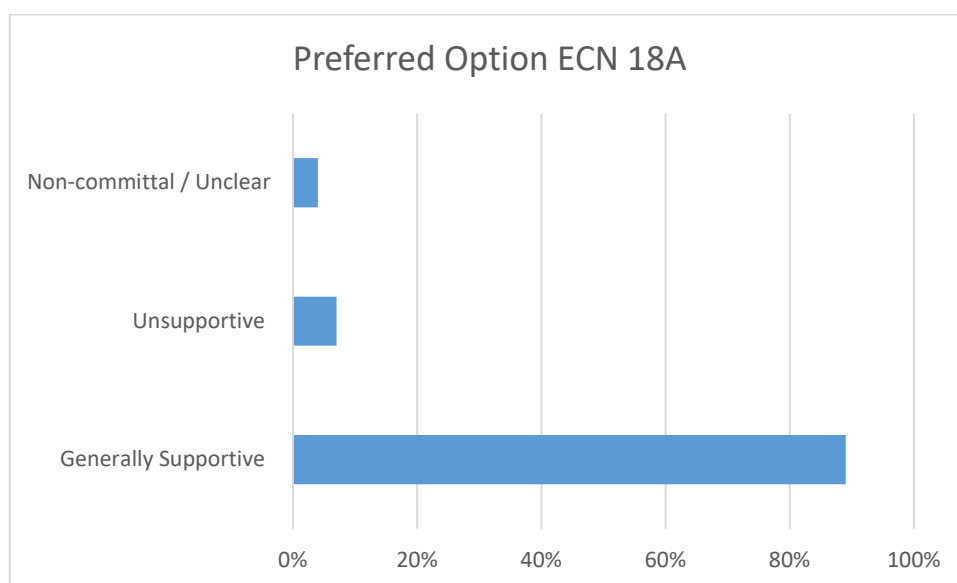
Identify and protect accessible and safe greenways in order to encourage a modal shift away from the private car, connect people and places through active travel and enable ecological linkages.

The preferred approach recommended the identification and protection of greenways so to create a network of open spaces that provide links within and between rural and urban areas.

Key Issue Response Rate: 13%

27 of the 201 representations received made comment in respect of Key Issue ECN 18 (Promoting and enhancing access to greenways).

- 89% of the responses were generally supportive of the preferred approach;
- 7% of the responses were unsupportive of the preferred approach; and
- 4% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ECN 18

There was a high level of support for the preferred approach to Key Issue ECN 18, with 89% (24 No.) of the responses supportive of ECN 18A. Many of these responses did not substantiate or justify their support, however some of the comments that were received are detailed below.

- The preferred option provides an excellent opportunity to develop a significant Greenway network within the Borough (POP ref 109).
- Greenways have huge potential in attracting activity tourism markets as well being an invaluable health and wellbeing resource for local communities. They also deliver a number of health and environmental benefits such as reducing carbon dioxide emissions from our atmosphere (POP ref 148).
- The provision of green infrastructure is critical in promoting active travel and providing a shared space; defined walking routes and positive use of inland waterways creates opportunities for

leisure and tourism and should be evaluated, upgraded and expanded as part of the plan process (POP ref 148).

- The approach is consistent with the SPPS which aims to promote sustainable patterns of development which will reduce the need for motorised transport and encourage active travel (POP ref 179).

One of the respondents, who agreed with the preferred option, suggested that the approach should also include reference to blueways. The respondent also noted that the preferred approach is predicated on the need to identify and protect linear open spaces and considered that the retention of disused transport corridors is a key element to the delivery of such greenways (POP ref 135).

One respondent, whilst strongly agreeing with the protection of greenways, suggested that more emphasis should be placed upon the protection of open space as greenways or wildlife corridors that may not necessarily be a means of connecting people to places, as much as connecting them to nature (POP ref 064).

Another of the respondents suggested that the council should work with adjacent councils to ensure that, where opportunities exist, Greenway linkages across the Council boundary are enabled (POP ref 174).

Critique of the preferred approach to Key Issue ECN 18

Only 7% (2 No.) of the responses received in respect of ECN 18 were categorised as being unsupportive of the preferred approach. One of the respondents did not agree that the preferred approach towards greenways will improve connectivity and promote more sustainable patterns of travel, however they did not justify or substantiate their response (POP ref 004). The other respondent stated that greenways are not very often a practical means of travel, with more use in tourism (POP ref 006).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ECN 18 'Facilitating sustainable infrastructure, telecommunications and utilities development to meet the needs of the Borough' however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are:

- Planning Policy Statement (PPS) 3: Access Movement, Parking;
- Planning Policy Statement (PPS) 3 (Clarification): Access Movement and Parking; and
- Planning Policy Statement (PPS) 13: Transportation and Land Use

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Access, Movement and Parking in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include:

- Exceptions within Protected Routes Policy;
- Identification and safeguarding of Key Strategic Road Improvement Schemes;
- Introduction of a consistent approach towards disused transport routes across the Borough.
- Identification of new Park and Ride / Park and Share sites and the review existing sites.
- The requirement of all new development within urban areas to demonstrate that active travel networks and sustainable transport have been incorporated within the scheme.

A more detailed review of PPS 3 (and clarification) and PPS 13 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The Council welcomes the strong support for the preferred approach. The Council considers that by encouraging and developing a network of greenways throughout the Borough they will continue to become a viable means of travel. As such the identification and protection of greenways will be considered further as the LDP is progressed. Further engagement will be carried out with key stakeholders including neighbouring Councils to help inform this.

8 Environment Theme

The POP identified a total of 10 Key Issues across 6 topics under the Environment Theme. The key issues were identified to conserve, protect and enhance our key built and environmental assets. This section also outlines responses to flooding, renewable energy and waste management as detailed below.

This section deals with the following Key Issues:

Built Heritage and Archaeology

Key Issue ENV 1: Protecting, conserving and enhancing built heritage and archaeological assets

Natural Heritage

Key Issue ENV 2: Protecting international, national and local nature conservation designations (that are designated outside the LDP process)

Key Issue ENV 3: Identifying and protecting local nature conservation designations

Landscape

Key Issue ENV 4: Identifying and protecting Sensitive Landscapes

Key Issue ENV 5: Identifying and protecting Local Landscape Policy Areas (LLPAs)

Key Issue ENV 6: Identifying and protecting Urban / Rural Landscape Wedges

Flood Risk and Drainage

Key Issue ENV 7: Developing within areas of flood risk (flood plains)

Key Issue ENV 8: Encouraging Sustainable Drainage Systems (SuDS)

Renewable Energy

Key Issue ENV 9: Facilitating appropriate renewable energy development

Waste Management

Key Issue ENV 10: Facilitating sustainable waste management

Preferred Option, for Key Issue ENV 1 (Protecting, conserving and enhancing built heritage and archaeological assets)

Option ENV 1A

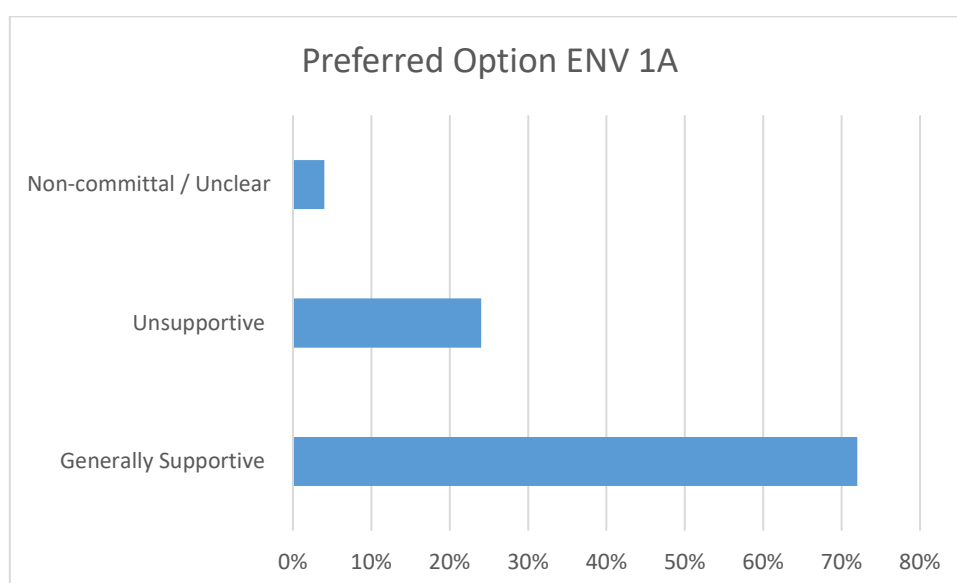
An approach in line with existing policy with regards to protecting, conserving and enhancing built heritage and archaeological assets within the Borough; and review existing areas / designations and identify new areas / designations as appropriate.

The preferred approach recommended a comprehensive review of all existing built heritage and archaeological areas / designations within the Borough and the identification of new areas / designations that may be worthy of protection through the LDP.

Key Issue Response Rate: 14%

29 of the 201 representations received made comment in respect of Key Issue ENV 1 (Protecting, conserving and enhancing built heritage and archaeological assets).

- 72% of the responses were generally supportive of the preferred approach;
- 24% of the responses were unsupportive of the preferred approach; and
- 4% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 1

There was a relatively high level of support for the preferred approach to Key Issue ENV 1, with almost three quarters (72% / 21 No.) of the responses supportive of ENV 1A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- Protecting heritage assets will ensure the Borough maintains its distinctive character and rich history, which can be critical for attracting tourism and a sense of place in neighbourhoods (POP ref 148).
- The approach allows for a comprehensive review of all existing built heritage and archaeological areas/ designations within the Borough (POP ref 179).

- It is important to maintain and enhance local character and distinctiveness, therefore policies to protect the important contribution that built heritage makes to the surrounding area are welcomed (POP ref 174).

One respondent, whilst welcoming the commitment to include local policies or proposals to safeguard the site of Navan and its setting from inappropriate development, strongly recommended that a local list of non-designated heritage assets for the Borough should be prepared (POP ref 142).

Another respondent, suggested that there are opportunities to make policy provisions stronger in relation to the historic environment, providing for public engagement with the archaeological process, opportunity for creative policy and conditions and also opportunity for better policy protections around industrial and defence heritage (POP ref 080).

Armagh City has a historic and unique built heritage, which should be promoted. Whilst sensitive development is required an approach should be developed that does not just seek to maintain historic and listed buildings but allows for sufficient flexibility to bring them back to use to be enjoyed, as either a tourist asset or for sympathetic commercial use (POP ref 148).

Critique of the preferred approach to Key Issue ENV 1

Almost a quarter of respondents (24% / 7 No.) who submitted comments in respect of ENV 1 did not support the preferred approach. Some of the accompanying comments that were received are detailed below.

One of the respondents considered that the best buildings and heritage assets need to be carefully protected, however the existing policy conserves too many mediocre buildings and urban environments. As such the respondent suggested that a less restrictive approach should be taken to the safeguarding the lesser elements, while a strong stance should remain in terms of what is truly valuable (POP ref 180).

One of the respondents, who was unsupportive of the preferred approach, suggested that sites should not be considered in a piecemeal way- there is a need to look at how everything is connected. The respondent suggested that a thorough assessment of the Built Heritage and Archaeological Assets is carried out, which considers more than just the information already held, involving community consultation, as well as expert evidence (POP ref 002).

Another of the respondents considered that none of the options for this Key Issue had regard for the protection and enhancement of the biodiversity that such buildings and places hold. The respondent highlighted that old buildings can often provide safe refuges for wildlife, as such any plans for regeneration/ refurbishment proposals should incorporate measures to continue to give nature a home (POP ref 135).

One of the respondents, who was unsupportive of the preferred approach, suggested that the Council re-examine thoroughly (and in close connection with the community) its entire stewardship of Built Heritage and Archaeology (POP ref 181).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 1 'Protecting, conserving and enhancing built heritage and archaeological assets', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are Planning Policy Statement (PPS)

6: Planning, Archaeology and the Built Heritage and the Addendum to Planning Policy Statement (APPS) 6: Area of Townscape Character.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Archaeology and the Built Heritage in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include a review of all existing built heritage and archaeological areas / designations and where appropriate, identify new areas / designations (Supported by Supplementary Planning Guidance, where appropriate).

A more detailed review of Planning Policy Statement (PPS) 6: Planning, Archaeology and the Built Heritage and the Addendum to Planning Policy Statement (APPS) 6: Area of Townscape Character will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Support for the preferred option is welcomed.

The constructive advice and suggestions raised in respect of ENV 1 will be fully considered in advance of the draft Plan Strategy.

Preferred Option, for Key Issue ENV 2 (Protecting international, national and local nature conservation designations (that are designated outside the LDP process))

Option ENV 2A

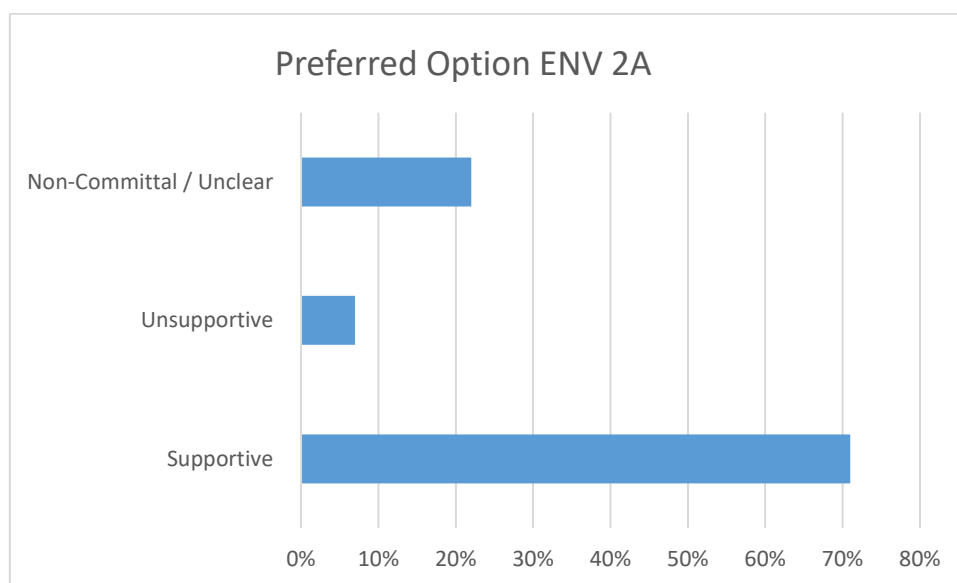
An approach in line with existing policy with regards to protecting and enhancing international, national and local nature conservation sites that are not LDP designations.

The preferred approach recommended carrying forward the policy provisions of existing Policies NH 1, NH 3 and NH 4 from Planning Policy Statement 2 (Natural Heritage) and the SPSS to ensure that all International, National and Local sites of Nature Conservation Importance designated outside the LDP process are afforded adequate protection against development proposals.

Key Issue Response Rate: 14%

28 of the 201 representations received made comment in respect of Key Issue ENV 2 (Protecting international, national and local nature conservation designations (that are designated outside the LDP process)).

- 71% of the responses were generally supportive of the preferred approach;
- 7% of the responses were unsupportive of the preferred approach; and
- 22% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 2

71% (20 No.) of the responses received in respect of ENV 2 were generally supportive of the preferred approach. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- The quarrying industry has a very important part to play in the conservation of natural heritage in view of the areas of land that it manages and achieving sustainable development in the industry. Whilst extraction activities can have damaging effects on the environment, they may also be important sites for biodiversity, as they can support a diverse mix of habitats and substrates (POP ref 062).

- Evidence of how the historic environment has been considered in context with the natural environment should be key to any policy determination and considered in the approach at Plan Strategy Stage. Natural heritage is inseparable from the historic environment and forms the immediate and wider (notably rural) setting of heritage assets, they often share common pressures and strengths regarding sensitivity to development and conversely providing important habitats and biodiversity (POP ref 080).
- A precautionary approach should be applied to the most sensitive areas and areas with specific characteristics or other important features and safeguard them (POP ref 148).

One of the responses highlighted that what we take to be natural, such as designed landscapes and demesnes, are in fact the result of human planning and management, with the natural Heritage and the historic environment often sharing common pressures. In this context, the respondent suggested that there should be clear discussion and policy indicating how the historic environment has been considered in the context of the natural environment (POP ref 142).

Critique of the preferred approach to Key Issue ENV 2

Only 7% (2 No.) of the responses were unsupportive of the preferred approach towards ENV 2. Whilst one of the respondents did not offer any justification, the other response was confidential in nature.

Almost a quarter of respondents (22% / 6 No.) that submitted comments in respect of ENV 2 were categorised as being non-committal. Whilst these responses did not offer a specific opinion on the preferred approach, they made a few comments and suggestions in respect of this Key Issue including:

- Any review should carefully consider changes to policy wording as subtle changes may weaken existing policy. There is the potential to obtain net biodiversity gain if the council considers it appropriate to go further than the SPPS in relation to biodiversity (POP ref 082).
- Policies to protect and enhance the natural environment should be integral to the overall strategy and they should accurately reflect the Regional Strategic Objectives with no weakening or dilution. The precautionary principle should be carried through in any natural heritage strategy and potential zonings should have *full regard* to natural heritage; it constitutes more than cognisance of sensitive landscapes / views (POP ref 135).
- The preferred approach does not indicate that the review of NH 2 (species by law) and NH 5 (Habitats, species or features of natural heritage importance) will either strengthen these policies or reduce protection. Such a review should increase protection, never erode it (POP ref 064).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 2 'Protecting international, national and local nature conservation designations (that are designated outside the LDP process)', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this topic is Planning Policy Statement (PPS) 2: Natural Heritage.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Natural Heritage in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include a review of

existing Sites of Local Nature Conservation Importance (SLNCIs), and the designation of new SLNCIs.

A more detailed review of PPS 2: Natural Heritage will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Council welcome the support for the preferred option ENV 2.

The comments and advice will be fully considered alongside further evidence gathering and engagement with key stakeholders in advance of the Plan Strategy.

Further consideration shall be given to the comments made in respect to the precautionary the approach to Natural Heritage is developed.

Preferred Option, for Key Issue ENV 3 (Identifying and protecting local nature conservation designations)

Option ENV 3A

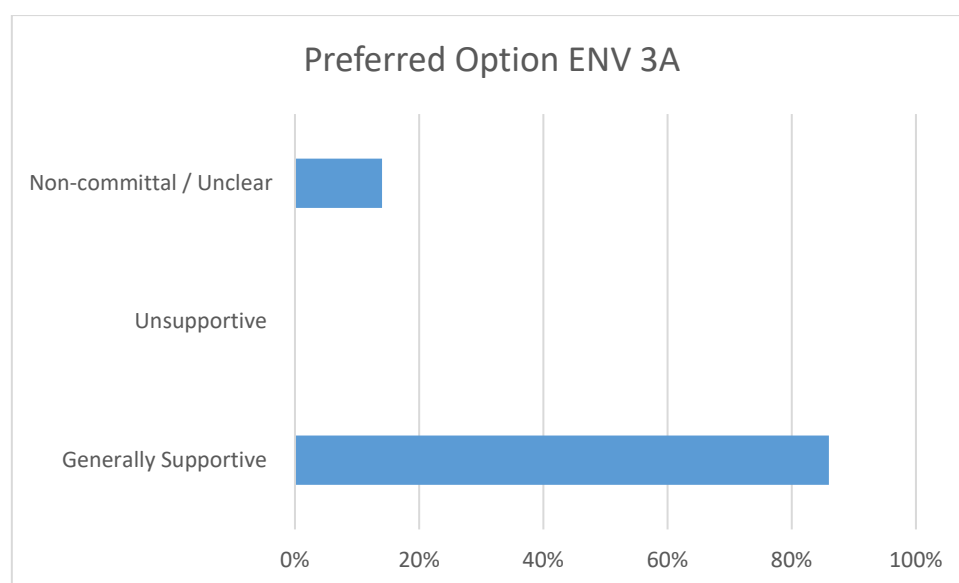
An approach in line with the existing policy with regards to protecting and enhancing local nature conservation designations; and review existing and identify new LDP designations as appropriate.

The preferred approach recommended the review of existing Sites of Local Nature Conservation Importance (SLNCIs) so to address any inconsistencies in approach across the existing Area Plans, in terms of the level of protection afforded to them. The preferred approach also recommended the designation of new SLNCIs in the LDP, that are worthy of protection due to their local nature conservation or earth science value.

Key Issue Response Rate: 14%

28 of the 201 representations received made comment in respect of Key Issue ENV 3 (Identifying and protecting local nature conservation designations).

- 86% of the responses were generally supportive of the preferred approach;
- 0% of the responses were unsupportive of the preferred approach; and
- 14% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 3

There was a high level of support for the preferred approach to Key Issue ENV 3, with almost three quarters (86% / 24 No.) of the responses supportive of ENV 3A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- There is a need to review and identify local nature conservation designations and protect them from inappropriate development (POP ref 147).

- The intention to protect the intrinsic value of Sites of Local Nature Conservation Interest (SLNCI's) against development proposals in the LDP is welcomed, however the identification of areas that have potential for protection would have been helpful (POP ref 113).
- Any potential impact must be comprehensively and scientifically considered (POP ref 177).

One of the respondents advocated that the LDP must afford protection to local designations, including SLNCI's, however stated that any review which would result in the potential delisting of a SLNCI should examine the reasons for loss in quality and put in place measures to aid its recovery (POP ref 135).

Another of the respondents, who was supportive of the preferred approach, noted that the natural heritage is inseparable from the historic environment and suggested that as the LDP process develops there should be clear discussion and policy indicating how the historic environment has been considered in the context of the natural environment (POP ref 142).

Critique of the preferred approach to Key Issue ENV 3

None of the responses received in respect of ENV 3 were categorised as being unsupportive of the preferred approach. However, 14% (4 No.) of the responses were categorised as being non-committal or unclear. Whilst these responses did not offer a specific opinion on the preferred approach, they made a number of comments in respect of this Key Issue including:

- The preferred option does not stress whether the review is as likely to remove protection, as to afford new protection. Such weakness in indicating the overall intention to increase protection, provides an opportunity to believe the intention will be to reduce protection or protected sites (POP ref 064).
- Forest Service would be willing to provide information that may be relevant to potential new LDP designations in respect of woodland it manages (POP ref 126).
- Any review should carefully consider changes to the wording as subtle changes may weaken existing policy. There is the potential to obtain net biodiversity gain if the Council considers it appropriate to go further than the SPPS in relation to biodiversity (POP ref 082).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 3 'Identifying and protecting local nature conservation designations', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this Key Issue is Planning Policy Statement (PPS) 2: Natural Heritage.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Natural Heritage in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include a review of existing Sites of Local Nature Conservation Importance (SLNCIs), and the designation of new SLNCIs.

A more detailed review of PPS 2: Natural Heritage will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The overall support for preferred approach to ENV 3 is welcomed. All constructive advice and suggestions will be further considered in advance of the draft Plan Strategy. The Council is in agreement that this must be an informed approach, with further evidence gathering and engagement with relevant key stakeholders, as the plan progresses.

Preferred Option, for Key Issue ENV 4 (Identifying and protecting Sensitive Landscapes)

Option ENV 4A

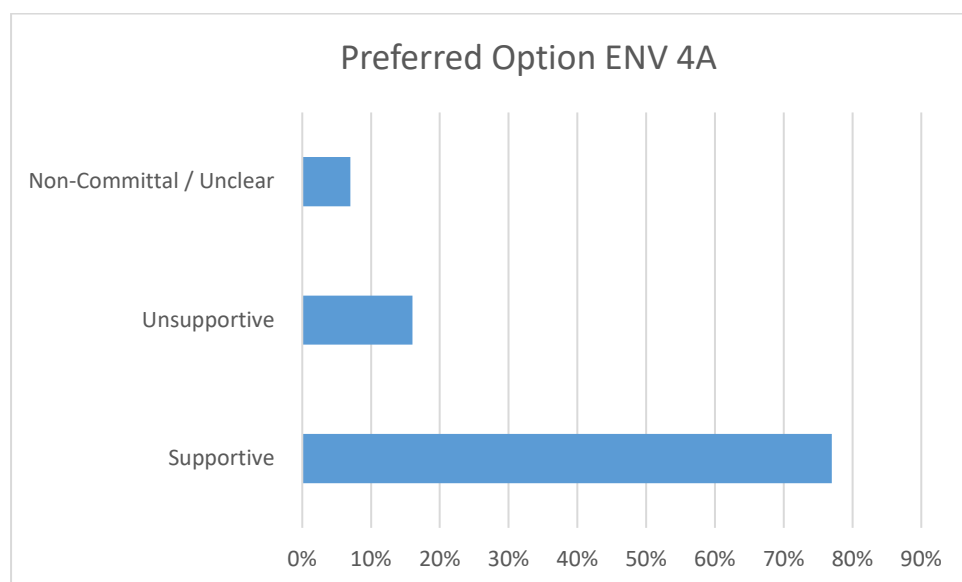
Consider areas of sensitive landscape for designation as Areas of High Scenic Value (AoHSV) or Special Countryside Areas (SCA).

The preferred approach recommended the identification and protection of the most sensitive scenic landscapes, such as the Lough Neagh Shore and / or Blackwater Valley.

Key Issue Response Rate: 15%

31 of the 201 representations received made comment in respect of Key Issue ENV 4 (Identifying and Protecting Sensitive Landscapes).

- 77% of the responses were generally supportive of the preferred approach;
- 16% of the responses were unsupportive of the preferred approach; and
- 7% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 4

There was a relatively high level of support for the preferred approach to Key Issue ENV 4, with over three quarters (77% / 24 No.) of the responses supportive of ENV 4A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- Lough Neagh is a site of international scientific and natural heritage importance and councils should work together to formulate policy to ensure that development that would impact negatively on its overall character and which is contrary to the rationale of the designations which it enjoys, should be resisted (POP ref 059).

- Whilst the recognition of 'special landscapes' and measures to protect their landscape character, environment and heritage assets is welcomed it would have been useful to propose a policy context that has regard for *all* the landscape areas in the Borough (POP ref 142).
- An up to date local Landscape Character Assessment (LCA) will recognise the importance of protecting and enhancing the local landscape character and visual amenity of the Plan area. It will also assist in protecting and enhancing the landscape character and visual amenity of the Plan area, inform judgements and decisions about designations and policies, including assisting in identifying and protecting sensitive landscapes and assist in recording and monitoring changes in the landscape character and visual amenity over time and indicate different pressures and opportunities (POP ref 082).
- The Council should implement adequate policies to protect designated areas from unnecessary or inappropriate development and should identify areas with specific characteristics or other important features and safeguard them, as they create a sense of place and contribute to the tourism of the Borough (POP ref 148).

One respondent, although supportive of the preferred approach, strongly recommended that before any land designations are made Geological Survey are consulted to ensure that there are no important and essential minerals and aggregate reserves in the proposed designations, so to ensure minerals reserves are not sterilised (POP ref 062).

Another respondent, who welcomed the identification of Special Countryside Areas (SCA) advised that full cognisance must be given to the natural environment and its biodiversity outside designated sites. The respondent highlighted that it is crucially important that such areas do not become the 'sink holes' for development and therefore the potential environmental impacts of any development or constraint zoning must be thoroughly assessed in the decision making process (POP ref 135).

Whilst supportive of the preferred approach, one of the respondents suggested that before applying any protective designations a robust assessment must be undertaken to ensure that such a designation will not impede other aspects of the Plan. The respondent highlighted that this is particularly relevant to the minerals industry as these resources may only be worked where they are found, and they are often located in sensitive areas (POP ref 177).

Critique of the preferred approach to Key Issue ENV 4

16% (5 No.) of the respondents who submitted comments in respect of ENV 4 did not support the preferred approach. Whilst two of these responses were confidential in nature, some of the other comments that were received are detailed below.

- If the Council is genuine in its intention to identify and protect areas, then it must liaise more fully with the people living within the Borough in a way which is easy for them. People live within and develop landscapes and are affected by their environment in ways which policies cannot detect. Asking people what their land and landscapes mean to them is a critical part of identifying and protecting areas of sensitive landscape (POP ref 181).
- There is not enough information in the consultation document about the proposals to ensure that they are fully transparent and meaningful consultation can take place. The justification states that 'any landscape designations will be informed by an appropriate evidence base' but gives no indication what such an appropriate evidence base might be or who might be consulted (POP ref 182).

One of the respondents stated that it is not adequately explained exactly how sensitive landscapes will be identified and protected, and queries how people are going to be consulted (POP ref 002).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 4 'Sensitive Landscapes' and agreed that sensitive landscapes need to be protected and development limited in such areas. Members raised concerns regarding both overdevelopment and no development in the countryside. Further discussion took place regarding Special Countryside Area's (SCA) and Area's of High Scenic Value (AoHSV), the two designation options for protecting the sensitive landscapes in the Borough. Members discussed the location, extent and implications of potential designations in addition to other constraints to development, such as flooding, that already exist and therefore offer a level of protection. It was agreed that the Landscape Character Assessment, once completed, would further inform the process.

Our comments

The overall support for the preferred approach to ECN 4 is welcomed. All suggestions and constructive advice / criticism will be fully considered as the approach to this Key Issue is developed. The Council will undertake a review of the Local Landscape Character Assessment for the Borough and engage with key stakeholders including Natural Environment Division and adjoining Councils to help inform the Council's approach towards landscape policy and designations.

Preferred Option, for Key Issue ENV 5 (Identifying and protecting Local Landscape Policy Areas (LLPAs))

Option ENV 5A

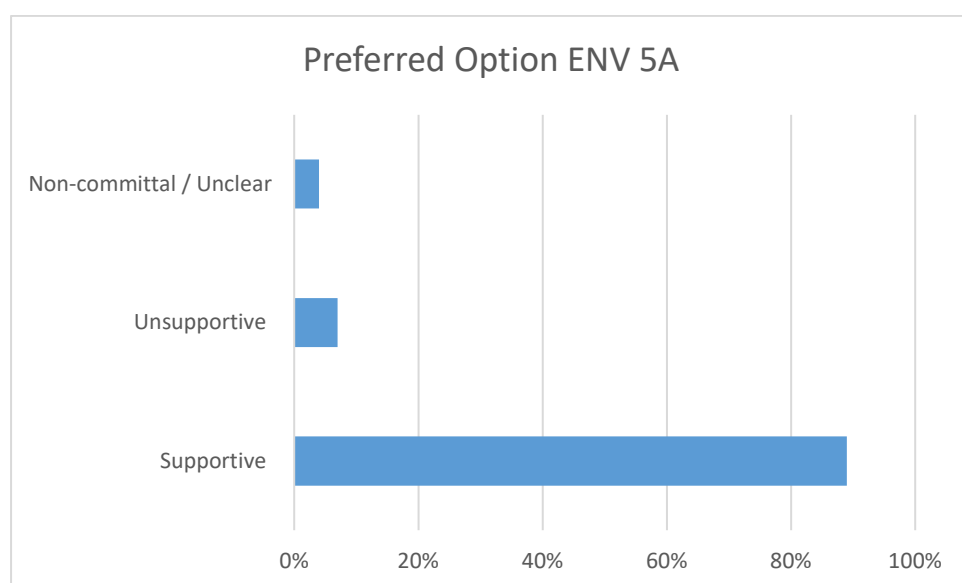
Evaluate and, as appropriate, retain existing Local Landscape Policy Areas (LLPAs) designated in the extant Area Plans; consider the identification of new LLPAs; and introduce a consistent LLPA policy.

The preferred approach recommended a review of existing LLPAs and associated designated text / key features to introduce a more consistent approach across the Borough. The preferred approach also recommended that new areas for LLPA designation are considered and that policy is consistent across the Borough in line with regional planning policy.

Key Issue Response Rate: 14%

28 of the 201 representations received made comment in respect of Key Issue ENV 5 (Identifying and protecting Local Landscape Policy Areas).

- 89% of the responses were generally supportive of the preferred approach;
- 7% of the responses were unsupportive of the preferred approach; and
- 4% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 5

There was a very high level of support for the preferred approach to Key Issue ENV 5, with 89% (25 No.) of the responses supportive of ENV 5A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- Local Landscape Policy Areas (LLPAs) recognise important assets and features which contribute to the landscape character, visual amenity, heritage and cultural interest and biodiversity of settlements. An up to date local Landscape Character Assessment (LCA) will recognise the importance of protecting and enhancing the local landscape character and visual amenity of the Plan area (POP ref 082).

- The LDP should identify areas with specific characteristics or other important features and safeguard them as they create a sense of place and contribute to the tourism of the Borough. Environmental Protection should be considered as there is a significant emphasis on the impacts that development can cause, it is critical that these are identified early in the process and that development of inappropriate sites is resisted (POP ref 148).
- The position that LLPAs do not preclude development and will be appropriate for sensitive forms of development, particularly tourist related uses which utilise the asset, is welcomed (POP ref 102).
- The consistent approach to designation of LLPAs is welcomed. It is expected that the detailed LCA will assist in identifying the LLPAs to be retained and any additional designations (POP ref 113).
- The retention/enhancement of these areas, and the recognition that they provide for biodiversity and ecological networks is welcomed. These areas can include green and blue infrastructure, riverbanks and shorelines, woodland and trees, all of which make a positive contribution to the Borough's biodiversity, often in an urban landscape (POP ref 135).
- Councils must now engage properly with the community and other governmental bodies and NGOs in order to identify correctly areas which must be given special protection. This engagement process should be proactive, accessible, and fully advertised (POP ref 181).

One respondent, although supportive of the preferred approach, advised that they would like to see consistent usage of LLPA's across all areas as it often appears that single properties are singled out for inclusion, whilst an entire area is intrinsic to the local character (POP ref 064).

Another respondent, who advocated the proposed retention of existing policy protection and additional designations, highlighted the importance of demonstrating how historic environment evidence has been used in evaluating and informing identification and designation (POP ref 080).

Critique of the preferred approach to Key Issue ENV 5

Only 7% (2 No.) of the responses were unsupportive of the preferred approach towards ENV 5. Whilst one of the responses was confidential in nature, the other considered that the proposed policy is too restrictive, stating that within LLPAs there should be significant flexibility to allow good quality development proposals. The respondent also stated that LLPAs should only be designated if an area is truly valuable, rather than the broad-brush approach often taken in the past (POP ref 180).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 5 'Identifying and protecting Local Landscape Policy Areas (LLPAs)', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policies relating to this Key Issue are Planning Policy Statement (PPS) 6: Planning, Archaeology and the Built Heritage and the Addendum to Planning Policy Statement (APPS) 6: Area of Townscape Character. In relation to LLPAs it states that with an increased emphasis on the quality of new development and greater environmental awareness care must be taken to ensure that new development does not dominate the townscape / landscape characteristics of settlements.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Archaeology and the Built Heritage in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances.

A more detailed review of Planning Policy Statement (PPS) 6: Planning, Archaeology and the Built Heritage and the Addendum to Planning Policy Statement (APPS) 6: Area of Townscape Character will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The overall support for the preferred option is welcomed; the Council will further consider all comments and constructive criticism as the approach to ENV 5 is developed.

The Councils approach to LLPAs will also be informed by further study including a review of existing and proposed LLPA's across the Borough as the plan progresses and ongoing engagement with relevant statutory consultees.

Preferred Option, for Key Issue ENV 6 (Identifying and Protecting Urban / Rural Landscape Wedges)

Option ENV 6A

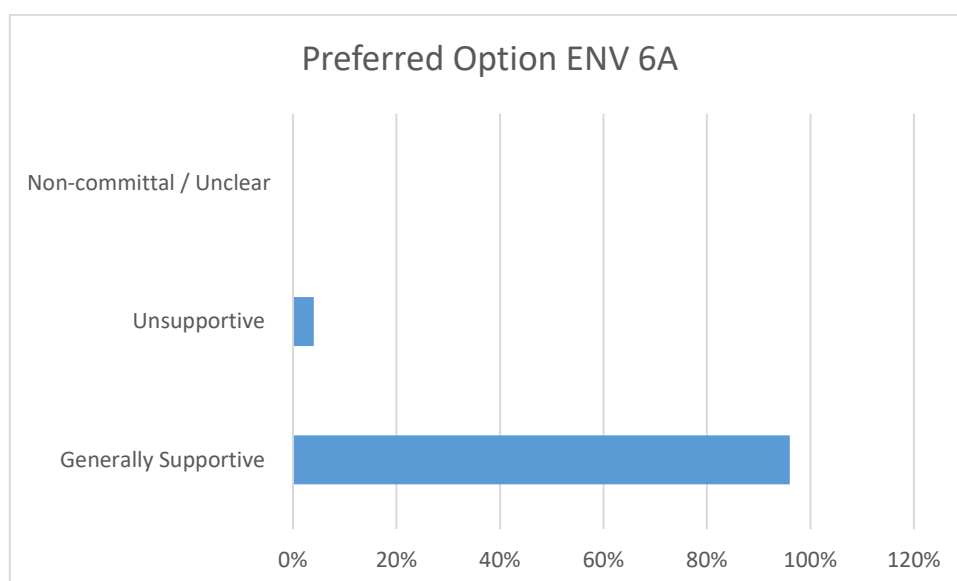
Review existing open space wedges and policy zones as potential Urban Landscape Wedges; and identify both new Urban and Rural Landscape Wedges with associated policy.

The preferred approach recommended the introduction of a consistent approach to landscape wedge designation and Plan policy that would replace the existing designations and policy for open space wedges and policy zones in the Armagh Area Plan 2004. The preferred approach would assist in protecting the setting, landscape features and character of the settlements from inappropriate forms of development which would adversely impact on their form, relationship and character.

Key Issue Response Rate: 13%

27 of the 201 representations received made comment in respect of Key Issue ENV 6 (Identifying and protecting Urban / Rural Landscape Wedges).

- 96% of the responses were generally supportive of the preferred approach;
- 4% of the responses were unsupportive of the preferred approach; and
- 0% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 6

There was a very high level of support for the preferred approach to Key Issue ENV 6, with 96% (26 No.) of the responses supportive of ENV 6A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- Wedges can provide important wildlife corridors linking up with other important areas for biodiversity, thus creating important ecological networks within the plan area, while providing space for nature to expand at a landscape scale (POP ref 135).

- Too often, areas that should be preserved are built on, resulting in a dense tangle of development with no connection to space and environment, leading to a general degradation of the townscape and the countryside (POP ref 064).
- The LDP should identify areas with specific characteristics or other important features and safeguard them as they create a sense of place and contribute to the tourism of the Borough (POP ref 148).
- An up to date local Landscape Character Assessment (LCA) will recognise the importance of protecting and enhancing the local landscape character and visual amenity of the Plan area, assist in protecting and enhancing the landscape character and visual amenity of the Plan area and will inform judgements and decisions about designations and policies, including assisting in designating wedges (POP ref 082).

One of the respondents was supportive of the preferred approach however this was on the basis of an assessment being carried out which balances both economic and environmental need. The respondent strongly recommended that Geological Survey are consulted, before any land designations are made, to ensure that there are no important and essential minerals and aggregate reserves in the proposed designations (POP ref 062).

Another of the respondents, who welcomed the potential designations, stated that they could not provide detailed comment as they were unsure as to where landscape wedges will be identified and what criteria may be used in their evaluation. However, they highlighted that heritage assets could have an important role in defining landscape wedges (POP ref 080).

Whilst supportive of the review of wedges and identification of new wedges, one respondent considered that it would have been helpful if specific spatial options had been presented, detailing which areas have the potential for protection. As such, the respondent advised that the Council should consider presenting any open space wedges or policy zones of a strategic nature in the Plan Strategy (POP ref 113).

Critique of the preferred approach to Key Issue ENV 6

Only 1 (4%) representation was categorised as being unsupportive of the preferred approach towards ENV 6, however this response was confidential in nature. Although none of the comments detailed in the confidential responses have been included within this report, they will be fully considered as the LDP is progressed.

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 6 'Identifying and Protecting Urban / Rural Landscape Wedges', however made no additional comments.

Our comments

The strong support for the preferred approach towards urban / rural landscape wedges is welcomed. In advance of the Draft Plan Strategy and Local Policies Plan, potential landscape wedge designations, constructive advice and criticism will be further considered. The approach will be informed by further evidence gathering including a review of existing wedges and identification, evaluation of potential new wedge designations.

Preferred Option, for Key Issue ENV 7 (Developing within areas of flood risk (flood plains))

Option ENV 7A

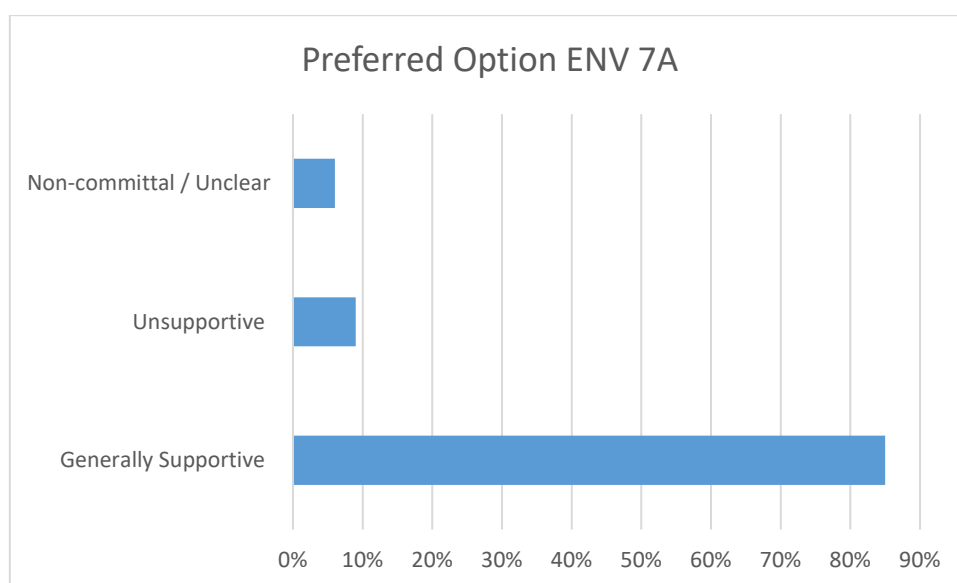
Adopt a precautionary approach in line with existing policy and regional direction by having a presumption against development in flood plains other than in exceptional circumstances. The precautionary principle will be applied to areas which are currently subject to flood risk or in the future.

The preferred approach recommended that the presumption against development in flood risk areas, known as the precautionary principle, is continued unless it constitutes one of the listed exceptions.

Key Issue Response Rate: 16%

32 of the 201 representations received made comment in respect of Key Issue ENV 7 (Developing within areas of flood risk (flood plains)).

- 85% of the responses were generally supportive of the preferred approach;
- 9% of the responses were unsupportive of the preferred approach; and
- 6% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 7

There was a high level of support for the preferred approach to Key Issue ENV 7, with 85% (27 No.) of the responses supportive of ENV 7A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

- Rivers are a priority habitat and the continued presumption against building in floodplains is welcomed (POP ref 082).
- The Council should develop a flood risk strategy, which includes a number of key actions including a strongly worded policy which clearly and robustly prevents new development in areas known to be a risk from flooding, or may increase the risk of flooding elsewhere, includes a policy to promote

sustainable development through retention and restoration of natural floodplains and natural watercourses as a form of flood alleviation and an important environmental and social resource, promoting an integrated and sustainable approach to the management of development and flood risk (POP ref 135).

- Natural flooding has helped to give our landscape and countryside its unique character and is vital for the wetland wildlife. Flood management should be about protecting and enhancing the natural environment alongside protecting people and property from the damaging impacts of floods (POP ref 135).

One of the respondents strongly agreed with a precautionary approach when considering development within identified flood plains, however considered that this should be extended to areas with historic evidence of flooding (POP ref 064).

Another of the respondents, who agreed with preferred approach, noted that a significant existing economic development zoning in Armagh sits within the floodplain. The respondent considered that under the preferred approach this could not be developed other than in exceptional circumstances and therefore suggested that economic zonings are closely considered (POP ref 111).

Whilst in agreement with the preferred approach, one of the respondents highlighted that there is a lack of detail and an omission to provide the preferred strategic direction to deal with other flood risk scenarios, such as development in proximity to reservoirs, protection of flood defence and drainage infrastructure and artificial modification of watercourses (POP ref 113).

One of the respondents, although supportive of the preferred approach, requested greater emphasis on critical matters such as climate change (POP ref 147).

Critique of the preferred approach to Key Issue ENV 7

Only 9% (3 No.) of the responses were categorised as being unsupportive of the preferred approach towards ENV 7. One of the respondents considered that alternative option ENV 7B is a more sustainable approach towards developing within areas of flood risk, as it would prohibit all forms of development, including proposals of regional and sub-regional importance, within current and future flood prone areas. This respondent also queried how the proposed new settlements may affect flood plain issues (POP ref 080).

Another respondent considered that many types of development are low-risk and are compatible with flood risk areas. Therefore, instead of a ban of all development in flood plains which does not meet the requirements of "exceptional circumstances" the respondent suggested a more flexible and scientific approach should be applied. The respondent advised that this approach has been used for some time in the UK whereby flood zones have been divided into different risk categories, allowing for certain types of development (POP ref 177).

One of the respondents acknowledged that a precautionary approach is essential in ensuring that safe and appropriate development is facilitated, however considered that the listed exceptions to development are too restrictive. Instead, the respondent suggested that the precautionary approach should extend to a simple policy which allows development within potential floodplains subject to a robust Flood Risk Assessment (with appropriate mitigation if necessary), demonstrating no increased risk of flooding to the development or neighbouring lands should be adopted (POP ref 185).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 7 'Developing within areas of flood risk (flood plains)', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this Key Issue is Planning Policy Statement (PPS) 15: Planning and Flood Risk. The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Flood Risk in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include promoting Sustainable Drainage Systems (SuDS) as the preferred method of managing surface water drainage within new urban development.

A more detailed review of PPS 15 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The strong support for ENV 7A is welcomed. Comments in relation to development within floodplains will be fully considered alongside further engagement with relevant stakeholders in advance of the Draft Plan Strategy.

Preferred Option, for Key Issue ENV 8 (Encouraging Sustainable Drainage Systems (SuDS))

Option ENV 8A

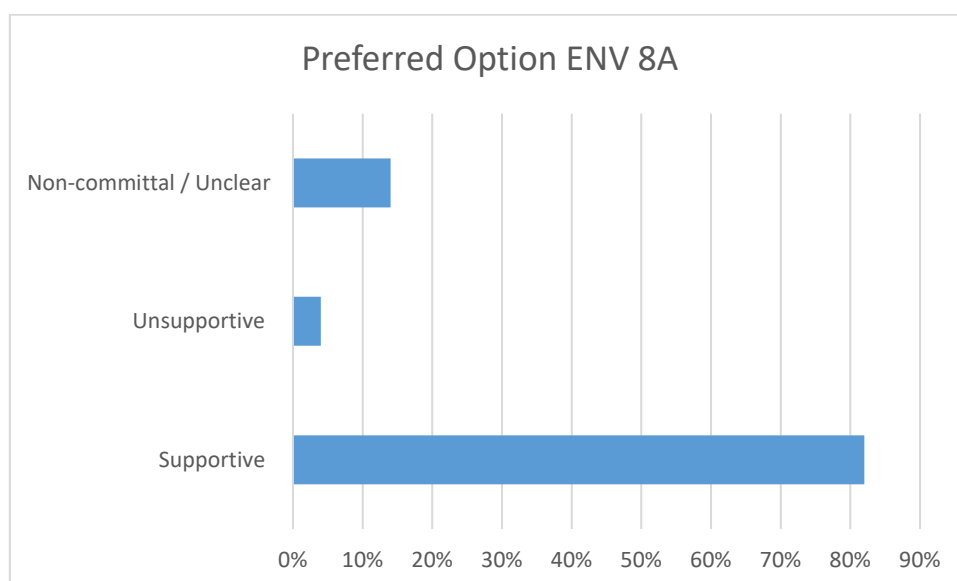
Bring forward policy to encourage the use of Sustainable Drainage Systems (SuDS) in new development where appropriate.

The preferred approach recommended that Sustainable Drainage Systems (SuDS) are promoted as the preferred method of managing surface water drainage within new urban development. The preferred approach would update and go further than the current policy provisions in that it would encourage the integration of SuDS schemes irrespective of any history or potential of pluvial flooding and greater onus would be placed on the developer to demonstrate why SuDS would not be suitable.

Key Issue Response Rate: 14%

28 of the 201 representations received made comment in respect of Key Issue ENV 8 (Encouraging Sustainable Drainage Systems (SuDS)).

- 82% of the responses were generally supportive of the preferred approach;
- 4% of the responses were unsupportive of the preferred approach; and
- 14% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 8

There was a high level of support for the preferred approach to Key Issue ENV 8, with 82% (23 No.) of the responses supportive of ENV 8A. Many of these responses did not substantiate their support, however some of the comments and suggestions that were received are detailed below.

- The approach of “encouraging” the use of sustainable drainage systems (SuDS) in new development is in keeping with SPPS (POP ref 059).
- It will be the local aggregates industry, employing local people and using local materials that will provide the building materials to facilitate the provision of robust and resilient flood defences (POP ref 062).

One of the respondents, who welcomed the preferred approach, highlighted that there is an opportunity to design in biodiversity benefits in SuDS systems (POP ref 082).

Whilst welcoming the preferred option of furthering the existing policy from 'favourable consideration' to the 'encouragement of SuDS', one respondent felt that this may not go far enough, as the 'where appropriate' caveat at the end of the preferred option also provides further wriggle room in its interpretation. The respondent suggested that SuDS should be promoted within new developments, along with retrofits to existing developments, when assessments prove the need (POP ref 135).

One of the respondents, although supportive of the preferred approach, requested greater emphasis on critical matters such as climate change and also highlighted that it is important to work with other agencies to ensure that SuDS are given primacy (POP ref 147).

Critique of the preferred approach to Key Issue ENV 8

Only 1 response (4%) was categorised as being unsupportive of the preferred approach towards ENV 8. The respondent indicated a preference for option ENV 8B, whereby the current approach to SuDS would be continued, with each application considered on a case by case basis, however no rationale or justification was provided (POP ref 177).

14% (4 No.) of the responses were categorised as being non-committal or unclear. Whilst these responses did not offer a specific opinion on the preferred approach, they made a number of comments in respect of this Key Issue including:

- The impact of SuDS on any archaeological sites, known or unknown, should be carefully considered, including the presence of heritage assets, in relation to mitigation measures. (POP ref 080).
- In its policy considerations the Council, particularly where it goes further than existing provision, should be mindful of any impact this might have on the viability of development schemes (POP ref 111).
- The Council should ensure that the implications for a firmer policy approach are explored in terms of responsibility for maintenance and management of SuDS. The Council should work closely with DfL Rivers when drafting policy in relation to management of surface water to ensure it is compliant with the SPPS (POP ref 113).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 8 'Encouraging Sustainable Drainage Systems (SuDS)', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this Key Issue is Planning Policy Statement (PPS) 15: Planning and Flood Risk. The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Flood Risk in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include promoting Sustainable Drainage Systems (SuDS) as the preferred method of managing surface water drainage within new urban development.

A more detailed review of PPS 15 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Strong general support for the preferred option ENV8A is welcomed. The Council considers that the preferred approach would place greater onus on developer (for certain types) to demonstrate why SuDS would not be suitable for a particular scheme.

However, further engagement with relevant consultation bodies will be carried out in advance of the Plan Strategy to explore how best to encourage the implementation of SuDS in policy terms and ensure the management and maintenance of such schemes.

Preferred Option, for Key Issue ENV 9 (Facilitating appropriate renewable energy development)

Option ENV 9A

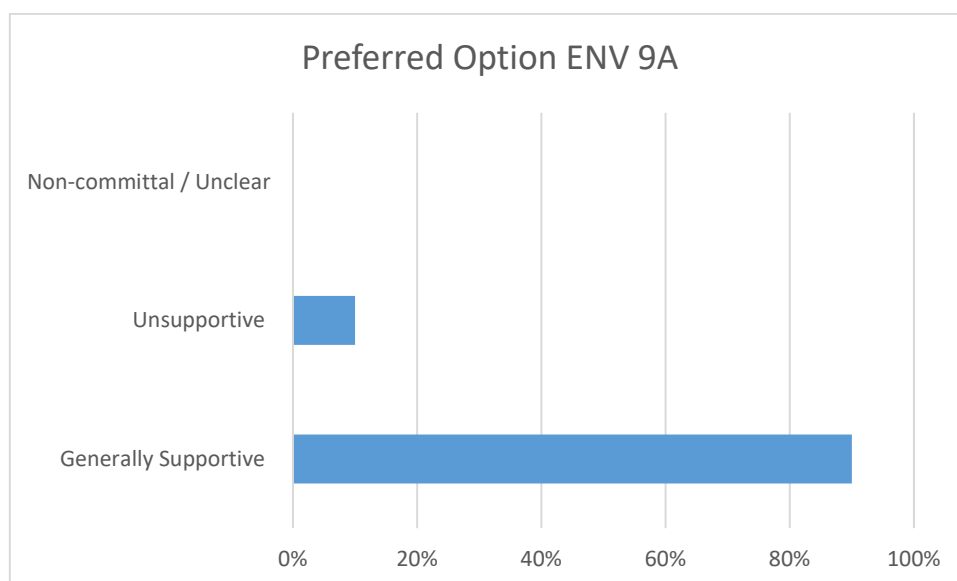
An approach to renewable energy development in line with existing policy but in addition, identify areas of sensitive landscape which may be unsuitable for particular forms of renewable energy development.

The preferred approach recommended a sustainable approach towards renewable technology development through the protection of environmental, landscape and historic features. The preferred approach would also seek to ensure that the visual impact on the landscape and residential amenity is not adversely affected. In addition, the preferred approach recommended identifying sensitive landscapes that may not be able to support certain forms of renewable energy technology.

Key Issue Response Rate: 15%

30 of the 201 representations received made comment in respect of Key Issue ENV 9 (Facilitating appropriate renewable energy development).

- 90% of the responses were generally supportive of the preferred approach;
- 10% of the responses were unsupportive of the preferred approach; and
- 0% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 9

There was a very high level of support for the preferred approach to Key Issue ENV 9, with 90% (27 No.) of the responses supportive of ENV 9A. The following illustrates the range of comments and suggestions that were received:

- While energy is critical, so too is the environment, and protecting identified areas is important (POP ref 064).
- The Borough needs to move away from primary production of energy through fossil fuels to more sustainable low carbon renewable technologies, in order to meet government targets on climate change and carbon emissions. This raises new challenges such as the effects of windfarms and

single turbines in landscapes with sensitive species and habitat features. Therefore, it is important to have the right development in the right place at the right time (POP ref 135).

- The Borough benefits from a rich natural environment and the Preferred Option would help to protect that asset. It would benefit all stakeholders if the LDP included an energy strategy that clearly illustrated where renewable developments are restricted and, equally, locations where they will be more suitable (POP ref 174).
- The approach strikes a balance between providing appropriate renewable energy development and despoiling the countryside. Development that is appropriate in scale or location should be actively encouraged. Account will need to be taken of the ability of the landscape to absorb new development and the impacts on amenity (POP ref 148).
- Special care should be taken in identifying protected areas. The most scenic/sensitive areas are typically upland/drumlin landscapes and by their very nature these areas provide the best wind resource (POP ref 177).
- The preferred option recognises the value of renewable energy development but also provides policy which gives greater weight to environmentally sensitive areas. This would essentially result in a stricter policy approach to the existing policy contained within PPS 18 (POP ref 179).
- The LDP has an important role in enabling renewable development in a way which minimises conflict with other objectives, which requires collection of a robust evidence base, not only of potential to generate energy, but also of the social and environmental factors that need to be considered (POP ref 135).
- The landscapes around historic monuments and/or areas of outstanding natural beauty and/or cultural or historically important sites should be considered as sensitive landscapes and offered full protection (POP ref 181).

One of the respondents considered that sensitive landscapes should be identified and protected from inappropriate renewable energy infrastructure stating that this is one of the most important and crucial issues facing the borough (POP ref 002). Another respondent agreed with preferred approach to facilitating renewable energy development, however, did not agree that sensitive landscapes should be identified and protected from inappropriate renewable energy infrastructure, instead suggesting that renewable energy projects should be prioritised (POP ref 004).

Another of the respondents, who welcomed the preferred approach, highlighted the importance of demonstrating how the historic environment evidence has been considered in informing appropriate zonings. The respondent acknowledged that heritage assets are not only assessed from a visual impact, but may be understood, seen, experienced and enjoyed. Therefore, the respondent suggested that the protection of the historic environment, as well as the settings of individual and linked or connected heritage assets from inappropriately sited renewable energy developments, should be considered. The respondent also raised concerns regarding the cumulative impact of renewable energy structures including tall structures, solar fields, associated groundwork, roadways in the vicinity of heritage assets and the wider historic environment (POP ref 080).

Critique of the preferred approach to Key Issue ENV 9

Only 10% (3 No.) of the responses were categorised as being unsupportive of the preferred approach towards ENV 9. Whilst one of the responses was confidential in nature, some of the other comments that were received are detailed below.

One of the respondents considered that the Council needs to far more clearly highlight its commitment to implementing planning policy and protecting vulnerable sites and suggested that it is not enough to say that 'sensitive landscapes should be identified and protected from inappropriate renewable energy infrastructure'. The respondent considered that the definition of 'sensitive landscape' should

be as clear as possible to avoid any ambiguity and the Council should further state its commitment to taking action against any breach of stated public policy (POP ref 182).

The other respondent indicated a preference for the alternative option ENV 9B which would continue the current approach to renewable energy development in line with existing policy, with each application assessed on a case by case basis. The respondent highlighted that there is a considerable difference between renewable energy technologies and planners should have the skills to assess each application on a case by case basis. The respondent offered further justification stating that solar farms are quick to deploy, in comparison with other energy generation technologies and believe that well sited solar farms can help meet Government targets without significantly impacting on local communities or the environment (POP ref 199).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 9 'Facilitating appropriate renewable energy development', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relevant to this Key Issue is Planning Policy Statement (PPS) 18: Renewable Energy.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Renewable Energy in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include identifying sensitive landscapes that may not be able to support certain forms of renewable energy.

A more detailed review of PPS 18 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

Strong support for the preferred option is noted.

It is important to note that the Department for Infrastructure (DfI) are reviewing the Strategic Planning Policy Statement (SPPS) in relation to 'Renewable Energy', following a Call for Evidence, and the outcome of this could affect the Council's policy direction in due course.

The Council acknowledges that there is a strong relationship between renewable energy and the delivery of sustainable development and as such the challenge for the LDP is to ensure that renewable energy development is managed carefully so that our environmental, landscape and historic features are not prejudiced.

Preferred Option, for Key Issue ENV 10 (Facilitating sustainable waste management)

Option ENV 10A

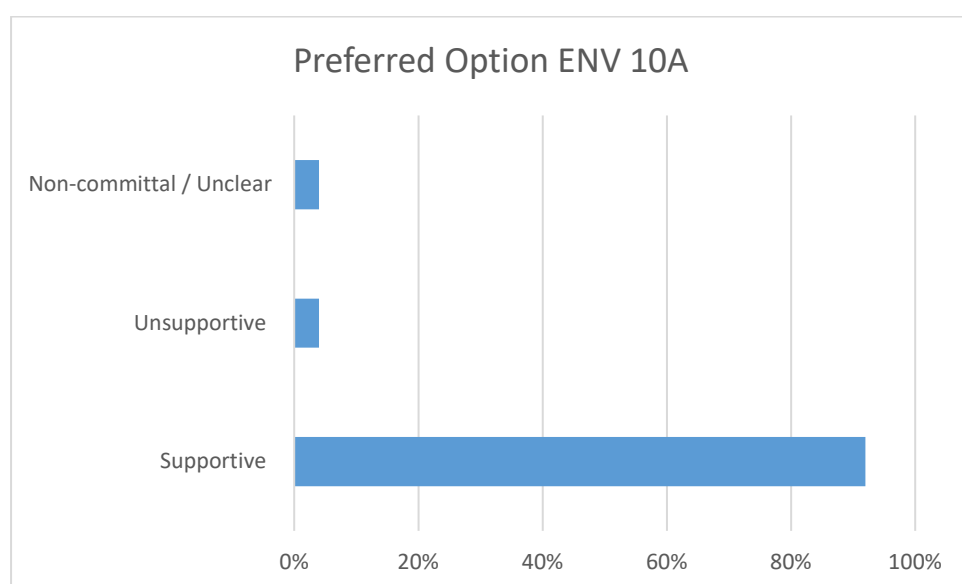
An approach to waste management in line with existing criteria-based policy but tailored to meet local circumstances; and in addition identify suitable locations for waste management facilities where appropriate.

The preferred approach recommended bringing forward an approach that is in line with the existing criteria based waste management policy however updating the wording to reflect the positive role that waste management can make towards sustainable development, emphasising waste as a resource as opposed to a burden and its role in developing a circular economy. The preferred approach also recommended identifying appropriate waste facilities and/or services in suitable locations that may be required over the plan period to support a growing population and sustainable waste management.

Key Issue Response Rate: 13%

26 of the 201 representations received made comment in respect of Key Issue ENV 10 (Facilitating sustainable waste management).

- 92% of the responses were generally supportive of the preferred approach;
- 4% of the responses were unsupportive of the preferred approach; and
- 4% of the responses were non-committal or unclear.



Summary of Comments

Supportive comments in respect of the preferred approach to Key Issue ENV 10

There was a very high level of support for the preferred approach to Key Issue ENV 10, with 92% (24 No.) of the responses supportive of ENV 10A. Many of these responses did not substantiate their support, however some of the comments that were received are detailed below.

A number of responses received in respect of ENV 10 referred to the proximity principle and / or the precautionary approach. One of the respondents strongly agreed with the preferred approach towards sustainable waste management, particularly in respect of the proximity principle and the

precautionary approach (POP ref 064). Another respondent was supportive of the inclusion of a precautionary approach, with particular emphasis on ensuring the protection of the historic and natural environment (POP ref 080).

In addition to noting that they are supportive of efforts to reduce, recycle and reuse materials, one of the respondents highlighted that they are opposed to incineration as a response to waste management (POP ref 125). Another of the respondents acknowledged that the preferred approach is reflective of current regional policy, with minor amendments to enable flexibility to the local circumstances of the Borough (POP ref 148).

One of the respondents strongly advocated a sustainable approach to waste management, an approach that would have regard to minimising the amount of waste being sent to landfill, while ensuring that there are no environmental risks associated with waste management, disposal or treatment. However, the respondent highlighted that this should go hand in hand with an effective enforcement strategy (POP ref 135).

Critique of the preferred approach to Key Issue ENV 10

Only one response (4%) was categorised as being unsupportive of the preferred approach towards ENV 10. The respondent considered that the POP failed by not stating that a sustainable approach may require the provision of a larger number of smaller strategically placed facilities to reduce carbon impact of recycling, for example, a requirement for bottle banks at new retail developments in the LDPs. The respondent also highlighted that the POP does not refer to contaminated land and how the council will ensure they understand where potential risks are located and how much contaminated land there is in the Borough (POP ref 082).

Only one response (4%) received in respect of ENV 10 was categorised as being non-committal. The respondent referred to further development of the evidence base, highlighting that the assessment of need for future waste management facilities, in order to identify potential sites, will form part of the evidence base and options will emanate from that. The respondent also highlighted that waste management infrastructure should not be located in areas which are prone to flooding, or in areas benefitting from a designated flood defence (POP ref 113).

Elected Representatives comments in respect of the POP Consultation Results

The Elected Members noted the results of the POP Consultation in relation to ENV 10 'Facilitating sustainable waste management', however made no additional comments.

Preliminary Policy Review

A preliminary review of operational planning policy was carried out to inform the Preferred Options Paper. The current operational policy relating to this Key Issue is Planning Policy Statement (PPS) 11: Planning and Waste Management.

The recommendation made by the Council in the Preliminary Policy Review was that the LDP should bring forward an approach to Waste Management in line with the existing policies and regional direction in the SPPS, tailored to meet local circumstances. Such local circumstances include modifying the policy wording to ensure that it is appropriate to the Borough.

A more detailed review of PPS 11 will be carried out in advance of the Plan Strategy, at which stage cross-cutting issues with other relevant topics will also be further explored.

Our comments

The support for ENV 10A is welcomed. Council will consider comments raised in representation responses, as the approach to waste management is developed.

9 General Comments

Site Specific Representations

In order to inform the preparation of the draft Plan Strategy only representations of a strategic nature were invited during the POP consultation period. Whilst most of the representations received were strategic in nature, a significant number of the representations also included a site-specific element, and a small number of the representations raised only site-specific matters.

Site specific issues have not been considered at this stage of the LDP process and therefore only the strategic element of representations that are of both a strategic and site-specific nature have been considered. During the Local Policies Plan Stage there will be an opportunity to submit representations of a site-specific nature and respondents have been advised that they will need to resubmit site specific representations at that stage of the process.

Other comments raised

A number of the representations included comments and opinions that did not relate to specific Key Issues presented in the POP. These comments and opinions have been recorded so that they may be taken into account, as appropriate, as the LDP is progressed.

Some of the comments that were received are detailed below.

- The options may have benefitted from being more concise and distinctive (POP ref 113).
- It will be critical to the success of the preferred options that the Council has the appropriate resources and expertise to assess the historic environment, heritage assets and their settings and also to assess their sensitivity to change and how any proposed development might impact on them.
- Regard should be given to the implications of proposals for adjoining council areas- provides opportunity for a collaborative approach (POP ref 113).
- The POP refers to 'tailored to meet local circumstances' –more detail on this tailoring is required (POP ref 174).

6 No. of the respondents made comments in respect of the POP consultation process including opinions on the format and wording of the online questionnaire, the advertisement of the Public Engagement Sessions, the advertising of the POP and the accessibility of the consultation process.

A small number of comments were received in relation to Brexit and also cross border and transboundary issues, particularly in relation to issues such as environmental and conservation designations, the historic environment, minerals development, tourism, retailing, transportation and flooding.

A small number of the respondents (4 No.) offered suggested terms for inclusion within the Glossary. 1 of the respondents suggested that The Waste Duty of Care, Contaminated Land and Waste Management should be referenced in the glossary (POP ref 082). The other respondents requested definitions of the Hierarchy of Centres, with one respondent highlighting that there are no such definitions in the SPPS and as such the Local Policies Plan creates the mechanism for such expressions and clarifications (POP refs 100 and 148).

Comments raised during Public Engagement Sessions

Those who attended the public engagement sessions were advised of the various ways in which a valid representation to the POP could be submitted, and the deadline for doing so. There were however a number of general comments raised verbally in relation to the key issues across the 20

engagement sessions. A summary of key themes which were discussed during the events are outlined below:

- Allocation of housing to specific settlements within the settlement hierarchy such as Middletown
- Rural Housing: the policies under which housing could be facilitated within the Countryside
- Open space provision / play park provision/ sporting facilities for young people
- Provision of adequate Community facilities across the Borough
- Improving transportation infrastructure across the Borough
- Car parking provision within the vicinity of health centres / community buildings in general
- Developer Contributions
- Site specific issues: land for inclusion within the settlement development limit and zoning for alternative uses
- Natural Heritage
- Landscape character
- Town centre vacancy rates / development opportunity sites
- Flooding and the use of sustainable drainage systems
- Rural tourism opportunities
- Transportation – disused transport routes (in particular the Armagh to Portadown disused rail line), protected routes
- Employment Lands allocation
- Borough Profile – referencing the sources used for the Borough profile
- General queries regarding the LDP process.

10 Responses received in relation to supporting documents

Equality Impact Assessment (EqIA)

An EqIA Report was prepared alongside the Preferred Options Paper to assess the likely impact of the LDP proposals on different sections of the community.

The Council has a Statutory duty under Section 75 of the Northern Ireland Act 1998 as a public authority, in carrying out its functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity between the nine equality categories of persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation; men and women generally; persons with a disability and persons without; and persons with dependants and persons without. In addition to this, public authorities are required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or race.

As such, the purpose of the EqIA was to:

- Consider the potential equality and good relations impacts of the Preferred Options Paper at a Strategic level focussing on the key inequalities which the preferred options can help to reduce;
- Provide an outline analysis of data and research on current major inequalities experienced by people in the section 75 groups in relation to the key commitments under the LDP; and
- Establish the positive equality impacts which the future Local Development Plan can make.

Each stage of the LDP will be subject to separate equality assessments.

Responses received in respect of the EqIA

A total of 12 representations were received during the consultation period in respect of the published EqIA. 3 No. of the representations were confidential in nature, however some of the comments that were included in the other responses are detailed below. Although the specific comments made in confidential representations have not been detailed in this report, they will be fully considered in the preparation of the Plan Strategy and any future equality assessment.

Half of the respondents (6 No.) considered that there was nothing that had been included in the EqIA that should be removed and that there were no other issues that should have been included in the EqIA (POP refs 001, 004, 176, 177, 179 and 188).

Although one of the respondents considered that there was nothing within the EqIA that should be removed, they suggested that there were other issues that should have been included in the EqIA. However, the respondent did not offer further justification or clarification (POP ref 181).

One of the respondents considered that there was something that had been included in the EqIA that should be removed, however they did not offer any further explanation or clarification. Furthermore, the respondent considered that there were other issues that should have been included in the EqIA, however no further explanation was provided (POP ref 180).

Another of the respondents simply stated that they were in agreement with the EqIA (POP ref 185).

Additional comments in relation to EqIA

2 No. of the representations did not offer an opinion on the Council's published EqIA, however they referred to the Council's Statutory Duty to carry out an EqIA. Some of the comments included in these responses are detailed below.

One of the respondents considered that the Council has the potential to vastly improve the lives of individuals and communities using its significant rates base, investment powers and the Community

Plan. Furthermore, the respondent considered that the Council must use its powers and the community plan to bring to an end historical pattern of discrimination and poverty in our society. The respondent also highlighted that the Council is obliged to ensure that the preferred options are subject to Statutory Duty requirements including Section 75 Equality Screening or full EqlA, Section 28E to address poverty and disadvantage, the Child Poverty Act 2010 and the Rural Needs Act (POP ref 125).

The other respondent expressed concern that equality was not acknowledged in the POP and suggested that more consideration should be given to how the principles of the LDP propose to fulfil Section 75 duties of the NI Act 1998. The respondent also reminded the Council that EqlA is required at a Strategic Level and there is a need to commit to equality screening and EqlAs as necessary. Furthermore, the respondent highlighted that the Borough has 9 of the top 100 NI Super Output Areas in terms of deprivation (2017 NISRA NI Multiple Deprivation Measure), and these statistics should provide a pivotal role in the informing and targeting of resources to the most deprived areas and monitoring the spatial impact of policy interventions (POP ref 147).

All comments received in respect to the Council's statutory obligations will be further considered in any subsequent EqlA.

Sustainability Appraisal (incorporating Strategic Environmental Assessment SA/SEA)

The Sustainability Appraisal (SA) assessed the sustainability of the LDP proposals and how they would combine and interact in the LDP to contribute to the achievement of sustainable development. The SA, which incorporates Strategic Environmental Assessment (SEA), is a continual process which runs parallel with the preparation of the LDP. Integral to this process is the consideration of social, economic and environmental issues.

One representation (SA ref 001) received during the 9-week consultation period made specific reference to the Sustainability Appraisal Interim Report and was submitted by the Natural Environment Division of the Northern Ireland Environment Agency (DAERA). Although this response focused upon the SA, it also included some comments in respect of the POP, including opinions on the preferred approaches to various Key Issues. Whilst these comments have not been included in the statistics presented earlier in this report (Sections 4-8) they have been taken into account and will be considered further in the preparation of the Plan Strategy.

In addition to the SA representation (SA ref 001), 15 POP representations also referred to the SA however these responses are considered in the following sections of this report.

The comments received from DAERA in relation to the SA / SEA have been summarised below.

General

DAERA expressed concern that the SA found no significant negative effects from any of the policy options. DAERA highlighted that in light of poor water quality, air quality, loss of biodiversity and disproportionate growth in some areas of the open countryside, additional built development is likely to have significant localised impact on the environment in some locations, which requires mitigation to reduce this effect. DAERA considered that although the SA recognised some impacts, the lack of recognition of potential significant effects could result in lesser emphasis on mitigation within the final environmental report and resulting plan.

Key Issue SGS 1: Defining a Settlement Hierarchy

DAERA acknowledged that the proposed Settlement Hierarchy includes 3 nodes south of Lough Neagh and noted that the SA indicates that this would result in an improved environmental situation due to sewage treatment with additional housing. However, DAERA considered that new settlement

nodes are drivers for additional housing, which will have an adverse effect on the local environment. As such DAERA recommended that the environmental report and HRA should look at this in more detail including what threshold NI Water use to put in treatment. DAERA also advised that there should be an assessment on swan fields and peatland habitats as well as other SA topics as they are likely to be impacted in the long term with additional growth in housing in this area.

DAERA noted that the SA indicated that the preferred option would positively enhance landscape character, however highlighted that the 3 nodes appear to be located within the Area of High Scenic Quality near Lough Neagh. DAERA considered that this impact should be highlighted, as additional development in this area is unlikely to improve the landscape character of the area. DAERA also highlighted that policies that promote rural housing / settlements have the potential to have negative impacts on air quality, by increasing the need for commuting.

Key Issue SGS 3: Allocating economic development lands

DAERA highlighted that the review of environmental considerations when looking at economic zoning should include habitats and landscape as well as flooding to ensure a more sustainable approach.

Key Issue SOC 2: Supporting sustainable rural housing

DAERA noted that the SA recorded no significant effects from the preferred approach towards sustainable rural housing. However, DAERA highlighted that where there is an existing environmental problem, which is likely to be exacerbated by additional housing, this could be considered to have significant effects that therefore requires mitigation. DAERA also highlighted that policies that promote rural housing / settlements have the potential to have negative impacts on air quality, by increasing the need for commuting.

Key Issue SOC 4: Protecting open space

DAERA advised that any re-evaluation of open space should include an ecological assessment to establish the significance of any loss, as this can inform the environmental report. DAERA also highlighted that it cannot be assumed that the biodiversity in greenfields is higher than in urban open space.

Key Issue SOC 5: Facilitating open space/play provision in new largescale residential developments

DAERA noted that it is proposed that Multi Use Games Areas (MUGAs) are included within play provision and highlighted that they can sometimes include floodlighting, especially if they are popular. DAERA advised that floodlighting can impact on light sensitive bats, particularly if they are located near waterbodies or woodlands. As such DAERA recommended that the potential issue of floodlighting should be considered within the SEA assessment, if this option is to be included, and areas where floodlighting would not be appropriate should be highlighted.

Key Issue ECN 3: Supporting Start up and Grow on Businesses

DAERA highlighted that there may be potential for a negative effect on biodiversity if only redundant buildings are used for start-up and grow-on businesses as they have potential to have roosting bats and nestling birds which would require consideration and mitigation.

Key Issue ECN 6: Protecting and strengthening town centres

DAERA highlighted that the review of town centre boundaries and primary retail cores should also consider environmental constraints, including biodiversity and flooding.

Key Issue ECN 9: Identifying Development Opportunity Sites (DOSs)

DAERA highlighted that the consideration of Development Opportunity Sites should consider urban biodiversity as well as flooding.

Key Issue ECN 10: Supporting sustainable tourism development

Although the promotion of tourist development within the countryside would be an exception under the preferred approach to tourism development, DAERA considered that there could be an adverse effect on biodiversity when development takes place. DAERA highlighted that Armagh has a large number of fens in the countryside which are highly susceptible to diffuse pollution and development within their zone of influence is likely to result in significant effects if no mitigation is included. DAERA recommended that mitigation should be included if this option is to be retained.

Key Issue ECN 11: Supporting sustainable minerals development

DAERA noted that the SA indicated a positive scoring in relation to restoration for this policy approach. However, DAERA considered that this would not be accurate in relation to peatlands. DAERA advised that the loss of biodiversity from mineral extraction cannot be adequately compensated for when peatland is impacted, especially if active, and would not result in a positive benefit, apart from exceptional cases, where the peatland was already highly damaged. DAERA advised that this should be reassessed in the environmental report.

Key Issue ECN 12: Facilitating sustainable infrastructure, telecommunications and utilities development to meet the needs of the Borough

DAERA noted that there were no negative impacts from infrastructure identified in the SA. However, DAERA advised that infrastructure has potential to impact on biodiversity if it is poorly located.

Key Issue ECN 14: Protecting proposed Strategic Road Improvement Schemes (SRI's)

DAERA noted that the SA did not identify any significant effects from the preferred approach towards SRI's. However, DAERA advised that roads can have a significant environmental effect on local biodiversity, highlighting that this was recognised in the POP where it acknowledged that EIAs are required where there are likely significant environmental effects. DAERA advised that this should be considered within the SEA environmental report. DAERA also highlighted that the preferred approach towards SRI's could lead to a deterioration in air quality through the promotion of private car use. However, they also acknowledge that SRI's could improve air quality by decreasing congestion in urban areas. As such DAERA suggested that the overall scoring should be neutral.

Key Issue ECN 15: Protecting the Borough's Disused Transport Routes

DAERA considered that as the preferred approach highlighting the potential reuse of disused transport routes in the future, it should be considered within the SEA environmental report that these areas may be important for wildlife and their reuse could have adverse effects on biodiversity. DAERA also highlighted that there could be potential for significant effects if lighting were introduced. Furthermore, DAERA highlighted that if the routes were to be reused for recreation or tourism, development would be required, and this would have associated impacts. However, DAERA

acknowledged that the SA scoring should be positive in respect of air quality if the policy is explicitly for creating walking or cycling routes.

Key Issue ECN 16 Park and Ride

DAERA highlighted that brownfield sites can have a biodiversity value which can be higher than intensive agricultural lands. Furthermore, DAERA considered that the SA scoring should be highly positive in respect of air quality.

Key Issue ECN 17: Promoting active travel and sustainable transport

DAERA noted that the SA report indicates that the biodiversity benefit is low. However, DAERA highlighted that there could be biodiversity benefits associated with this policy if new networks included habitat creation and provided linkages through urban areas to provide ecological corridors. DAERA also considered that the SA scoring should be highly positive in respect of air quality.

Key Issue ECN 18: Promoting and enhancing access to Greenways

DAERA acknowledged that the preferred approach may increase local biodiversity and also considered that the SA scoring should be highly positive in respect of air quality.

Key Issue ENV 2: Protecting International, National and Local Nature Conservation designations (that are designated outside the LDP process)

DAERA highlighted that there is potential to aim for net biodiversity gain if the council considers it appropriate to go further than the SPPS in relation to biodiversity. However, DAERA disagreed that there is no connection to sustainable housing or air quality from policy protection of priority habitats. DAERA highlighted that areas of woodland habitat and hedgerow trees can provide a localised benefit in relation to air quality by absorbing pollutants. Furthermore, DAERA suggested that housing developments should integrate habitat features, which include priority habitats such as hedgerows, woodland and rivers, to be more sustainable.

Key Issue ENV 7: Developing within areas of flood risk (floodplains)

DAERA highlighted that if exceptions to development in the floodplain are to be considered it is important to also consider the wider impacts on the river as well as the impact on flood risk.

Key Issue ENV 8: Encouraging Sustainable Drainage Systems (SuDS)

DAERA highlighted that the stronger approach to SuDS could also bring biodiversity benefits if they are designed in.

Key Issue ENV 9: Facilitating appropriate renewable energy development

DAERA highlighted that there is the potential to infer a presumption for development outside of the most sensitive landscapes. DAERA considered that this would need to be carefully managed, as the sensitive areas do not take into account other constraints such as habitats.

Key Issue ENV 10: Facilitating Sustainable Waste Management

DAERA highlighted that it will be important to include habitats, species and landscape considerations when identifying waste management locations within the LDP. DAERA acknowledged that the SA

does refer to reducing journeys in order to participate in recycling and the resultant impact of emissions on air quality, however, would suggest that the potential for increased public participation in recycling through the provision of more local facilities as a positive outcome should also be highlighted.

Additional comments

DAERA also made the following comments in respect of the SA Interim Report:

- Where appropriate throughout the report, adaptation should be used instead of adaption, as it is more accurate
- Where the wording 'influence on climate change' is used, the additions of 'mitigation and / or adaptation' or the term 'objectives' should be used. For example, 'influence on climate change mitigation and/or adaptation' or 'influence on climate change objectives.'
- Where the wording 'climate issues' is used suggest that 'climate change issues' is used for clarity.

DAERA also recommended that updated and new information, such as NIEA guidance, is considered as it becomes available and ensure that it is reflected in the SA at Plan Strategy and Local Policies Plan Stages. Furthermore, in order to develop the baseline evidence, DAERA suggested that spatial evidence, which is available on a range of priority habitats on the DAERA website, should be considered.

Other Representations to the Sustainability Appraisal (SA)

In addition to the specific SA representation detailed above (SA ref 001), 15 POP representations also referred to the SA. Of these 15 representations, 11 No. were submitted via the online questionnaire.

An overview of these responses, insofar as they relate to the SA, are set out below:

Online Questionnaire responses to the Sustainability Appraisal (SA)

An online questionnaire was accessible through the Councils website during the 9-week consultation period. By the end of the consultation period, a total of 17 respondents had completed the online questionnaire, however only 11 of these provided answers relating to the SA and Scoping Report (Question No's 47-52). The comments and opinions in the online questionnaire representations that related to the POP have been taken into account in sections 4-8 of this Public Consultation Report.

Of the 11 online questionnaire representations that provided answers to the SA and Scoping Report questions, 3 No. were confidential in nature, and as such this section of the report only details the responses of those which were not confidential (8 No.). Although the comments made in confidential representations have not been detailed in this report, they will be fully considered in the preparation of the Plan Strategy and any future SA.

Q 47. Do you agree with the overall approach taken to Sustainability Appraisal?

Of the 8 online questionnaire representations, 6 No. of the respondents agreed with the overall approach taken to the Sustainability Appraisal and 2 No. of the respondents did not agree.

Comments

Only one of the above respondents made additional comments in respect to this question (Q 47). The respondent welcomed the requirements of Objective 7 which recognises the need for the sustainable use and safeguarding of mineral resources (POP ref 177).

Q 48. The Evidence Base presented in the Scoping Report includes 14 topics which span the social, economic and environmental themes. Do you think the Evidence Base covers all appropriate topics?

Of the 8 online questionnaire representations, 5 No. of the respondents agreed that the evidence base covered all appropriate topics, and 3 No. of the respondents did not agree.

Comments

Only one of the above respondents made additional comments in respect to this question (Q 48). The respondent considered that the information provided a starting point but was not detailed enough to allow an accurate estimate of the demand for quarry products during the Plan period. The respondent noted that the figures provided were obtained from "ABC Planning Team 2017" however considered that the actual source of this information was unclear. The respondent advised that they had to assume that the output figure provided represented a single year and therefore was not representative of long-term outputs. Furthermore, the respondent noted that the annual output was presented as a monetary value, however it did not indicate tonnages, or the type of minerals produced. The respondent considered that this figure appeared low and suggested that it did not consider revenue generated from quarry-related products such as asphalt, ready-mix concrete and precast products. The respondent also noted that the Scoping report refers to 25 mineral sites whereas Key Issue ECN 11 (Supporting sustainable minerals development) refers to 16 active quarrying sites and suggested that correction/clarification is required. The respondent encouraged the Council to engage with quarry operators within the Borough to obtain more accurate estimates on existing reserves and annual outputs and advised that they would be happy to assist the Council on this matter (POP ref 177).

Q 49. Do you think all of the Key Sustainability Issues presented in the Scoping Report have been identified?

Of the 8 online questionnaire representations, 6 No. of the respondents agreed that all of the key sustainability issues presented in the Scoping Report had been identified and 2 No. of the respondents did not agree.

Comments

None of the above respondents made additional comments in respect to this question (Q 49).

Q 50. Sustainability Objectives have been identified through consideration of international, national, regional, and local policies, plans, programmes, strategies and initiatives, baseline information at regional and, where available, at local level and apparent trends. These are presented in the Scoping Report do you agree with the Sustainability Objectives?

Of the 8 online questionnaire representations, 6 No. of the respondents agreed with the Sustainability Objectives and 2 No. of the respondents did not agree.

Comments

Only one of the above respondents made additional comments in respect to this question (Q 50). The respondent advised that further research is required to provide an accurate representation of baseline conditions (POP ref 177).

Q 51. The SA/SEA Interim Report presents the appraisal of the options outlined in the Preferred Options Paper. It considered and assessed the compatibility of each option against the SA Objectives. Do you agree with the appraisal of each of the options?

Of the 8 online questionnaire representations, 5 No. of the respondents agreed with the appraisal of each of the options and 3 No. of the respondents did not agree.

Comments

Only one of the above respondents made additional comments in respect to this question (Q 51). The respondent considered that Mineral Safeguarding Zones, as referred to in ECN 11 (Supporting sustainable minerals development) should not be identified solely by the Geological Survey of Northern Ireland (GSNI)- the Health and Safety Executive for Northern Ireland (HSENI) and Environmental Health should also be involved to ensure that safeguarding zones are established to protect existing quarry operations. The respondent also highlighted that the SEA does not consider collaboration with neighbouring Council areas in relation to minerals, particularly in relation to the import/export of minerals from ACBCBC to/from other Council areas. The respondent suggested that this is a strategic matter that should be included within the LDP, considering the relatively small geographical area of Northern Ireland and the diversity of minerals which exist (POP ref 177).

Q 52. Do you have any further comments to make on the SA Scoping Report or Interim Report?

Of the 8 online questionnaire representations, 7 No. of the respondents advised that they had no further comments to make in respect of the SA, Scoping Report or Interim Report. Although 1 No. of the respondents indicated that they did have further comments to make on the SA, Scoping Report or Interim Report, they then advised that they had 'no specific comments' to make (POP ref 179).

Additional comments on the SA that were not submitted via the online questionnaire included:

- The SA/SEA lacked sufficient detail to enable a robust assessment of the proposed plan policies and for all reasonable alternatives to be accurately assessed. The respondent considered that the information used by the Council (in relation to minerals development) is of limited value as the information provided by the Department for the Economy (DfE), Quarry Products Association Northern Ireland (QPANI) and Geological Survey of Northern Ireland (GSNI) has not been updated for a number of years. The respondent queried whether any primary data has been collected or published by the Council and considered that without an accurate socio-economic and environmental profile of the plan area, it will result in an erroneous scoping report, conclusions and assessment of the POP (POP ref 130).
- Another of the respondents agreed with the general approach to the SA, however highlighted the importance of maintaining the evidence base so it can be demonstrated how it has been interpreted and utilised in informing scoring, or appropriate mitigation such as designation or key site requirements. The respondent expressed some concerns regarding the interpretation of evidence and scoring in respect of the historic environment and highlighted the importance of utilising relevant expertise to make for robust SA and SEA. In respect of the scoring of options the respondent also raised concerns that the scoring was not robust and did not recognise potential negative or uncertain impact on the historic environment. Throughout the detailed commentary the respondent expressed concern that the intertwined relationship between the historic environment, landscape character and the natural environment is not recognised across much of the scoring and highlighted that although in some cases there may be a positive effect for the historic environment, there is always significant potential for negative effects (POP ref 080).
- One of the respondents acknowledged that the SA would assist the Council in balancing and integrating the variety of complex social, economic and environmental matters which is fundamental to the achievement of sustainable development. The respondent highlighted that this will be important in demonstrating plan soundness. The respondent advised that the policy options should be tested through SA to make the decision making process as transparent as possible to ensure that a preferred option represents an appropriate alternative when set against the baseline environmental, economic and social characteristics of the district and assessed in combination with all policy proposals. The respondent also highlighted that failure to undertake SA of these elements may raise issues of procedural soundness and / consistency (POP ref 113).

- Another respondent welcomed the commitment by the Council to undertake both a Sustainability Appraisal (SA) and a Habitats Regulation Assessment (HRA). The respondent considered that the Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and HRA should be used as tools to minimise environmental impacts and that planning authorities should ensure that full protection is afforded to both designated and non-designated sites important for wildlife and biodiversity (POP ref 135).

Our Consideration

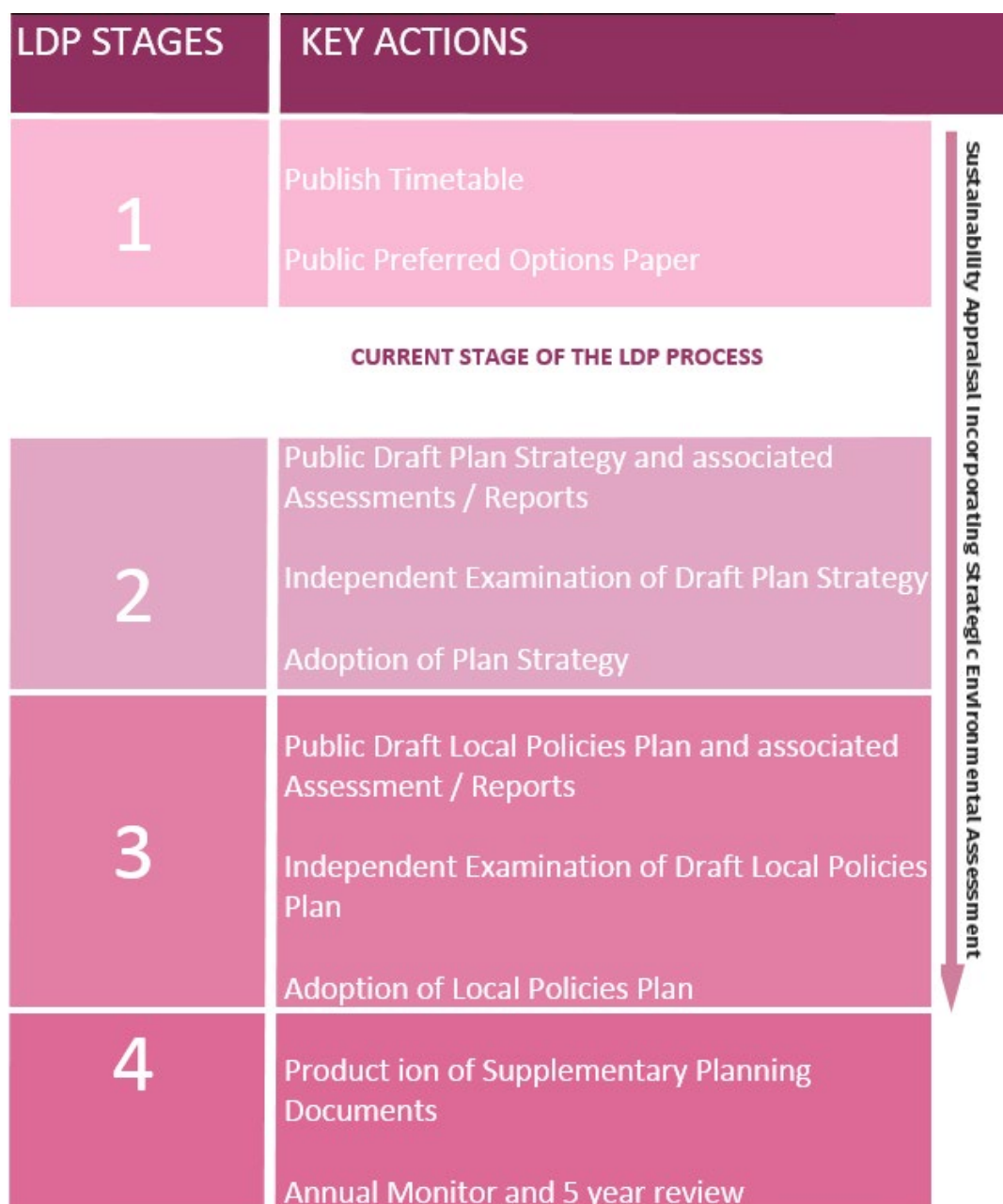
The comments raised in respect of the SA / SEA are noted.

Specific comments raised will be further considered and will assist the Council in ensuring that all proposed policies are thoroughly assessed and incorporated into future SA reports.

11 Conclusion

The publication of the POP and the POP Public Consultation Report marks the end of stage 1 of the LDP Process. This report provides a summary of the consultation process undertaken as part of the Preferred Options Paper. It also provides detail on the number of responses received, and the general level of support provided for each of the preferred options contained within the POP.

As the Council progresses onto the next stage of the LDP process, comments received during the consultation period will be fully considered to help inform the Draft Plan Strategy.



12 Appendices

Appendix A: Glossary

Appendix B: Preferred Options Paper (POP) Media Coverage

Appendix A: Glossary

Term	Definition
Active Travel	An approach to travel and transport by physically active, human-powered modes, as opposed to motorised vehicles.
Areas of Constraint on Minerals Development (ACMD)	Areas designated to protect the most valuable and vulnerable features of the natural environment and built heritage, including areas of high scenic value, from the adverse effects of mineral development.
Areas of High Scenic Value (AoHSV)	Areas designated in some Development Plans in recognition of their special landscape quality.
Built Heritage	Man-made features of the historic environment, including archaeological sites and monuments, listed buildings, conservation areas, historic parks, gardens, demesnes, and industrial heritage sites.
Community Plan	A strategic plan which LDPs reflect spatially through the land use planning system, linking public and private sector investment.
Conservation Area	An area designated under the Planning Act (Northern Ireland) 2011 as being of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance.
District Centre	A grouping of shops separate from a town centre, typically including a supermarket or superstore and non-retail services such as banks and restaurants.
Elected Members	Persons elected to the office of Alderman or Councillor within the Council.
Equality Impact Assessment (EqIA)	A process designed to ensure policies, procedures, projects or schemes are fair and do not discriminate or disadvantage individuals or groups.
Evidence Base	Information and data gathered by the Council to justify the soundness of policy approaches within the Local Development Plan.
Green and Blue Infrastructure	The network of green and blue spaces, including parks, gardens, farmland, trees, woodlands, rivers and ponds, considered collectively for their environmental and social value.
Greenways	Traffic-free routes that connect people to facilities and services while promoting sustainable travel.
Housing Growth Indicators (HGIs)	Regional Development Strategy indicators used to guide the distribution of housing across the region through the development plan process.
Housing Needs Assessment	An assessment of local housing needs, including social housing, supported housing, traveller accommodation and affordable housing.
Hubs	Settlements identified in the Regional Development Strategy as either Main Hubs or Local Hubs within the regional spatial framework.
Infrastructure	The physical and organisational structures and facilities, such as roads, buildings, utilities and water services, necessary for society and economic activity.
Listed Building	A building of special architectural or historic interest that has statutory protection.
Local Centre	A small grouping of shops providing local services, typically including a grocery store, post office and pharmacy.
Local Development Plan (LDP)	The Council's long-term plan for future development of the Borough, setting out land-use policies and proposals.

Local Landscape Policy Areas (LPAs)	Areas identified in Development Plans for their local amenity or landscape significance and protected from inappropriate development.
Local Policies Plan (LPP)	The second stage of the LDP, containing detailed policies and proposals for specific geographic or subject areas.
Mineral Safeguarding Zones (MSZs)	Areas designated to protect important mineral resources from sterilisation by other forms of development.
Natural Heritage	Biodiversity, ecosystems, flora, fauna, geological structures and geodiversity features.
Open Space Wedges	Areas within settlement limits that provide amenity value, separation between land uses, or help prevent over-intensive development.
Planning Agreement (Section 76)	A legally binding agreement used to secure developer contributions toward necessary facilities and infrastructure.
Planning Policy Statements (PPSs)	Regional planning policy documents that provide strategic direction and guidance for development plans and planning decisions.
Plan Strategy	The strategic component of the LDP that sets out the growth strategy, aims and objectives for the Borough.
Preferred Options Paper (POP)	An early consultation document identifying key planning issues, alternative approaches and preferred options for future development.
Preparatory Paper	Topic-based papers outlining the social, economic and environmental characteristics, issues and needs of the plan area.
Primary Retail Core (PRC)	The main focus of retail activity within a town or city centre and the preferred location for new retail investment.
Regional Development Strategy 2035 (RDS)	The Northern Ireland Executive's regional spatial strategy, guiding the spatial elements of government policy and investment.
Renewable Energy	Energy derived from naturally occurring and replenishable sources such as wind, solar, biomass and hydro-power.
Section 75 Groups	The nine equality categories identified under Section 75 of the Northern Ireland Act 1998 that public authorities must consider in policymaking.
Social Housing	Affordable rented housing provided by the Northern Ireland Housing Executive or Registered Housing Associations.
Soundness	The series of tests applied at Independent Examination to assess whether an LDP is coherent, consistent, effective and procedurally compliant.
Spatial Strategy	A long-term framework that guides and influences the location and pattern of future development.
Special Countryside Areas (SCA)	Areas of countryside subject to stricter planning controls because of their sensitive landscapes and special environmental qualities.
Stakeholders	Individuals or organisations affected by, or involved in, the preparation and delivery of planning policies and proposals.
Strategic Environmental Assessment (SEA)	A process that integrates environmental considerations into the preparation and adoption of plans, policies and programmes.
Strategic Planning Policy Statement (SPPS)	The overarching planning policy document for Northern Ireland, setting out strategic policies and planning principles.
Supported Housing	Accommodation with additional housing-related support for people requiring assistance to live independently.
Sustainability Appraisal (SA)	An appraisal process used to assess the social, environmental and economic impacts of LDP policies and proposals.

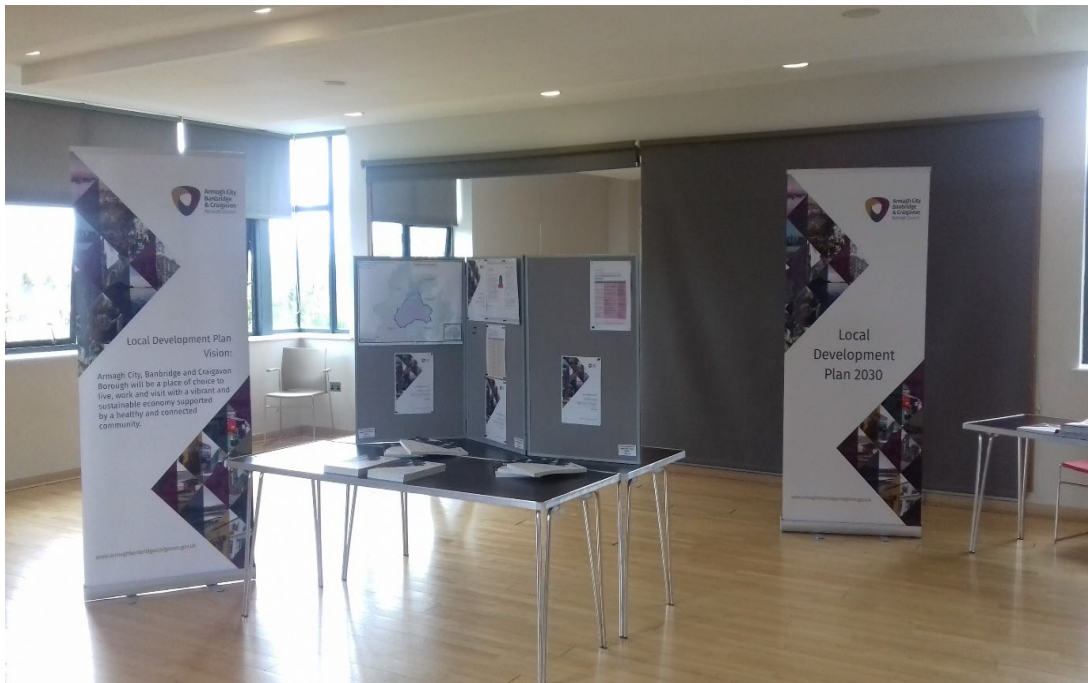
Sustainable Development Strategy (2010)	The Northern Ireland Executive's framework for promoting sustainability in decision-making and actions.
Sustainable Development	Development that meets present needs without compromising the ability of future generations to meet their own needs.
Sustainable Drainage Systems (SuDS)	Measures designed to manage surface water sustainably by reducing runoff, improving water quality and alleviating flooding.
Urban Landscape Wedges	Open or undeveloped areas within settlements retained to separate built development, provide visual breaks and protect important landscape features.
Urban Regeneration	A programme of physical, economic, social and community improvements aimed at revitalising urban areas.

Appendix B: Preferred Options Paper (POP) Media Coverage

POP Launch 28th March 2018 at Palace Stables, Armagh



Example Public Engagement Event room set up



Press Notice from week commencing 2nd April 2018



Public Notice

Local Development Plan 2030 Publication of Preferred Options Paper

In accordance with Regulation 10 of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, Armagh City, Banbridge and Craigavon Borough Council hereby gives notice that it published its Preferred Options Paper (POP), on 28 March 2018, for the new Local Development Plan (LDP). **A period of public consultation is open on the POP until 5pm on Wednesday 30 May 2018.**

The POP is the first of three main public consultation documents that the Council will issue during the Plan process. It is designed to promote focused debate on key issues of strategic significance which are likely to influence the direction of future development within our Borough up to 2030. The POP outlines the vision and strategic objectives of the Plan, along with a set of key issues and the possible options available to address them. The Council's preferred options are indicated in the Paper along with its reasoning behind them.

The outcome of the public consultation will inform the preparation of the Draft Plan Strategy, the next stage in the process (and the next public consultation document).

The POP is published along with a number of supporting documents which are also the subject of public consultation until Wednesday 30 May 2018. These include a Sustainability Appraisal Interim Report (incorporating the Strategic Environmental Assessment), a Sustainability Appraisal Scoping Report and an Equality Impact Assessment.

Availability of documents

The POP and supporting documents, including evidence base preparatory papers, can be viewed online at the Council's website at www.armaghbanbridgecraigavon.gov.uk/planning

This information is also available to view, in hard copy, at the Council's Planning Office at Bridgewater House, Banbridge and at the Council Offices at Craigavon Civic and Conference Centre, Banbridge Civic Building and Palace Buildings (Armagh), during normal office hours.

The POP and supporting documentation can be made available in other formats, and alternative languages where possible, upon request to the Council's Planning Office on 0300 200 7830.

How to respond

An Online Questionnaire on the POP and supporting documents is available at:
<https://armaghbanbridgecraigavon.citizenspace.com/>

Responses on the POP can also be forwarded to:
Planning LDP Team
Armagh City, Banbridge and Craigavon Borough Council
Bridgewater House
23a Castlewellan Road
Banbridge, BT32 4AX
or by email to ldp@armaghbanbridgecraigavon.gov.uk

The consultation period will close at 5pm on Wednesday 30 May 2018. We welcome your comments.

Public Engagement / Drop-in Sessions

There will also be a number of public engagement/drop-in sessions across the Borough, during the consultation period, where interested parties can call in to discuss the POP with planning officers. Details of these sessions are listed below.

Date	Event Type	Location
Tuesday 10 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	The Palace Demesne Friary Road Armagh BT60 4EL
Wednesday 11 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	The Palace Demesne Friary Road Armagh BT60 4EL
Wednesday 18 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	The Old Town Hall 1 Scarva Street Banbridge BT32 3DA
Thursday 19 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	The Old Town Hall 1 Scarva Street Banbridge BT32 3DA
Tuesday 24 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	Millennium Court Arts Centre William Street Portadown BT62 3NX
Friday 27 April 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	Brownlow Community Hub 7 Brownlow Road Craigavon BT65 5DL
Tuesday 1 May 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	Tommy Makem Arts & Community Centre 7 Cow Fair Keady Armagh BT60 3UE
Friday 4 May 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	Brownlow Community Hub 7 Brownlow Road Craigavon BT65 5DL
Tuesday 15 May 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	Rathfriland Community Centre John Street Rathfriland BT34 5QH
Tuesday 22 May 2018	Public Engagement Session Afternoon (1.30pm - 3.30pm) Evening (5.30pm - 7.30pm)	Lough Neagh Discovery Centre Oxford Island BT66 6NJ

ACBCBC Webpage Press Release 9th April 2018

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News

Have your say on shaping the future growth of ABC Borough

April 9, 2018

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Local Development Plan

Lord Mayor Gareth Wilson, Chair of the Planning & Regulatory Committee, Alderman Freda Donnelly and Roger Wilson (CEO) pictured at the launch of the Public Consultation on the Preferred Options Paper - Local Development Plan.

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Start your magical Christmas story at Portadown's spectacular switch on!

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Christmas Crafts at the Gallery offers gifts galore

November 6, 2018

Relive Armagh's Georgian Splendour at iconic four-day Festival

November 5, 2018

Council unwraps a cracking new Christmas programme for 2018

November 5, 2018

Borough welcomes launch of new sports bursary

November 5, 2018

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News

Reminder to 'Have your say' on Council's first Local Development Plan

April 30, 2018

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Latest News

Local schools join Council officers for the Big Spring Clean!

May 3, 2018

Parents invited to online safety awareness evening to help protect their children

May 2, 2018

Still time to register for this year's Heart & Sole Colour Dash!

May 1, 2018

Recycling Centres Bank Holiday opening hours!

May 1, 2018

FREE Chi Me sessions in Portadown People's Park

May 1, 2018

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