



**Causeway
Coast & Glens
Borough Council**

January 2019

Local Development Plan 2030 Preferred Options Paper Consultation

Report on Representations Received

EXECUTIVE SUMMARY

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1.0 INTRODUCTION

1.1 The Preferred Options Paper (POP) is the first public consultation stage in the preparation of the Council's Local Development Plan (LDP). It identifies key issues of strategic importance that need to be considered in the preparation of the Plan. It also examines a range of possible options to address these issues, including the Council's 'preferred options'. The POP seeks to stimulate wide-ranging yet focussed commentary from parties interested in the development of the Borough.

1.2 The POP Consultation: Report on Representations Received has been prepared to provide a summary of the key issues raised in response to the POP.

2.0 PURPOSE OF THE CONSULTATION REPORT

2.1 The Consultation Report will facilitate the Council's compliance with Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 (the 'LDP Regs'), which states that, *'A council must take account of any representations made in accordance with paragraph (2) before it prepares a development plan document'*.

Consultation Report (Summary)

2.2 The report represents a detailed summary of the POP representations received. It does not, at this stage, analyse their content, nor does it suggest possible policy approaches, as to do so requires further evidence gathering and consultation. The report is published for information purposes only. It will be sent to neighbouring Councils' for information and to highlight any cross boundary issues. A full analysis of the representations received (within the specified timeframe) will be presented in the final POP Consultation Report.

Consultation Report (Final)

2.3 This subsequent report will be an amalgamation of this summary report and an analysis of the representations received, and how the Council has considered these in the preparation of its Plan.

3.0 CONSULTATION PROCESS

3.1 The 12 week POP consultation period formally commenced on 26th June 2018 and ended at 5.00pm on 21st September 2018. This time scale complies with Regulation 11(3) of the LDP Regs which states that the consultation period *'must be a period of not less than 8 weeks or more than 12 weeks'*.

3.2 A Sustainability Appraisal/SEA (Scoping and Interim Reports) and an Equality Screening: Interim Progress Report were prepared in tandem with the POP and published for comment.

3.3 The following types of consultation also took place:

- Statutory Consultation/Elected Members/Internal Communications;
- Launch Event/Public Notice/Press Release;
- Council Website/Social Media;
- Register of Interest & Section 75 Groups/Equality Forum; and
- Public Engagement Events/Public Libraries/Local Planning Office.

3.4 In terms of the public engagement events, Appendix 1 of the main report provides an overview of attendance numbers and the main issues raised at each event. Information boards were displayed at all engagement events to provide an overview of the Borough and highlight key strategic issues and the Council's 'preferred options'. Hard copies of the POP and associated documents were made available to view and planning officers were in attendance to answer questions.

4.0 REPRESENTATIONS RECEIVED

4.1 The POP questionnaire contained 59 questions specific to the key issues and preferred options contained in the document, as well as the Sustainability Appraisal (Scoping and Interim Reports), and the opportunity to provide additional comments. The Council received a total of 101 (wide ranging) representations within the specified timeframe¹. In addition 11 representations were received outside this timeframe, therefore, they do not form part of this report.

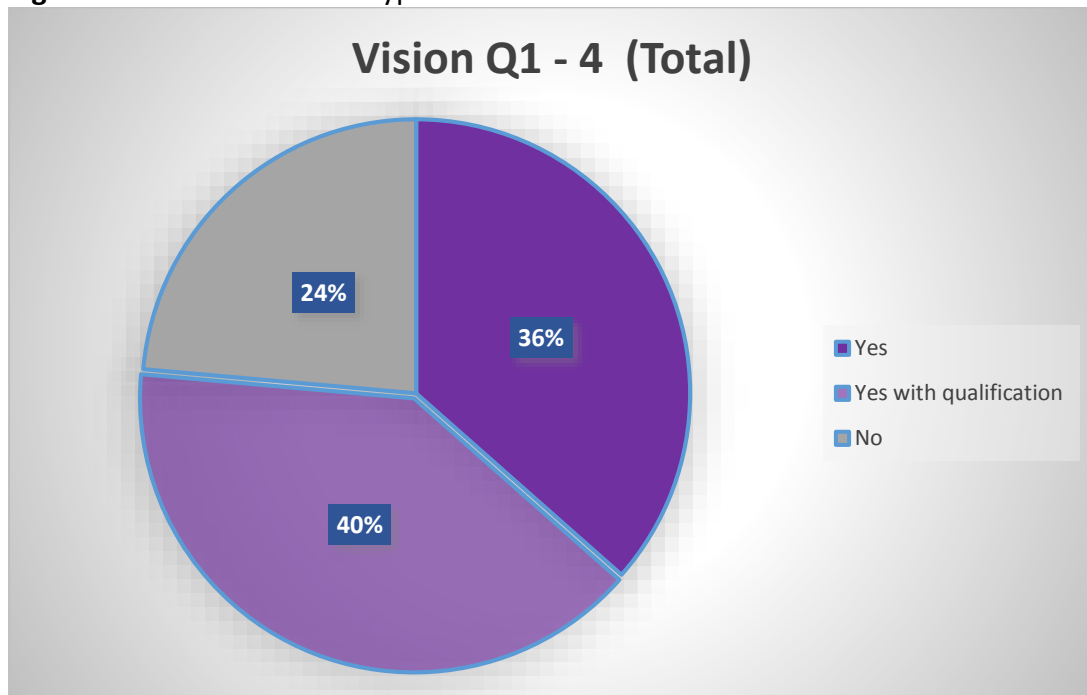
4.2 The charts presented on the following pages (under each strategic topic) represent a breakdown of the nature of comments received e.g yes/yes with qualification/no. The question numbers listed at each of the six topic headings relate to the relevant questions contained in the POP².

LDP VISION, OVERARCHING PRINCIPLES & STRATEGIC OBJECTIVES (QUESTIONS 1-4)

¹ Given the volume of comments received it is not possible to replicate these in an Executive Summary.

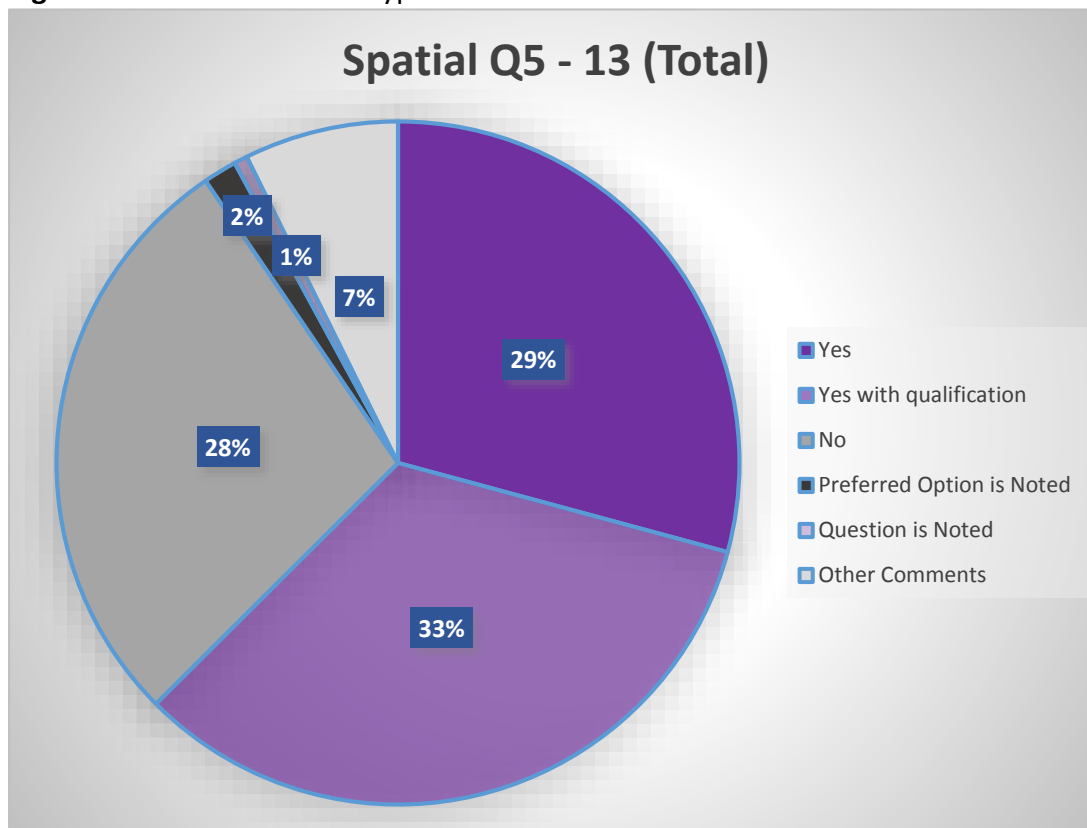
² Full details set out in the main report.

Figure 1: Breakdown of the type of comments received.



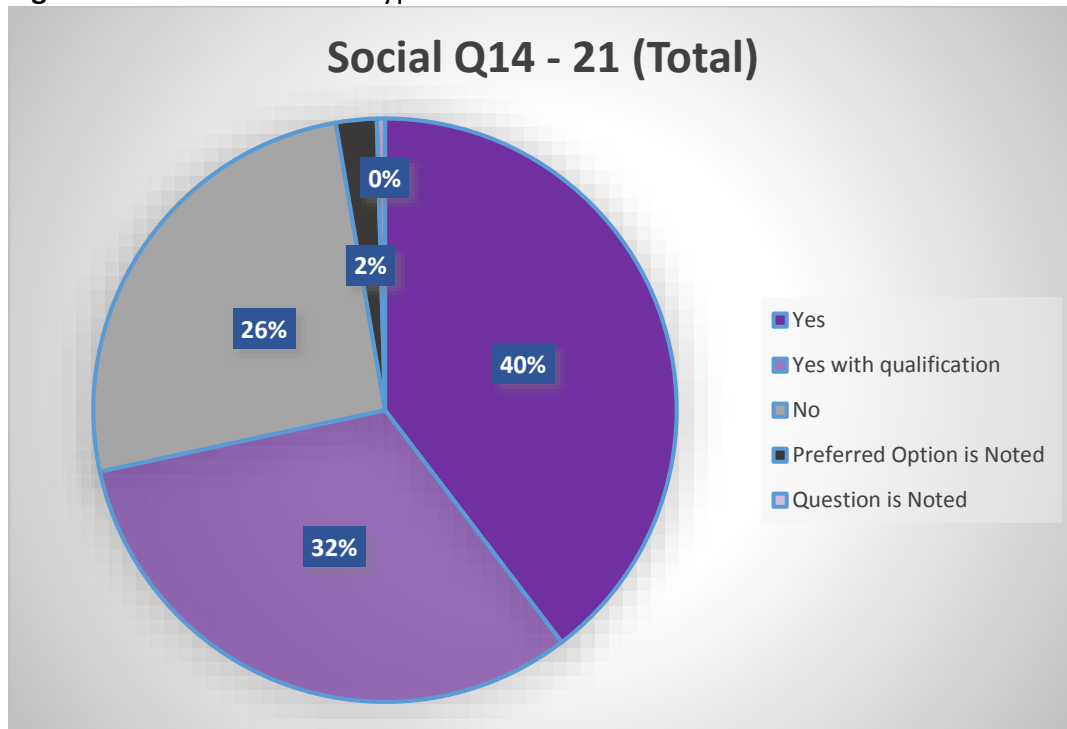
SPATIAL OPTIONS AND COMMENTS (QUESTIONS 5-13)

Figure 2: Breakdown of the type of comments received.



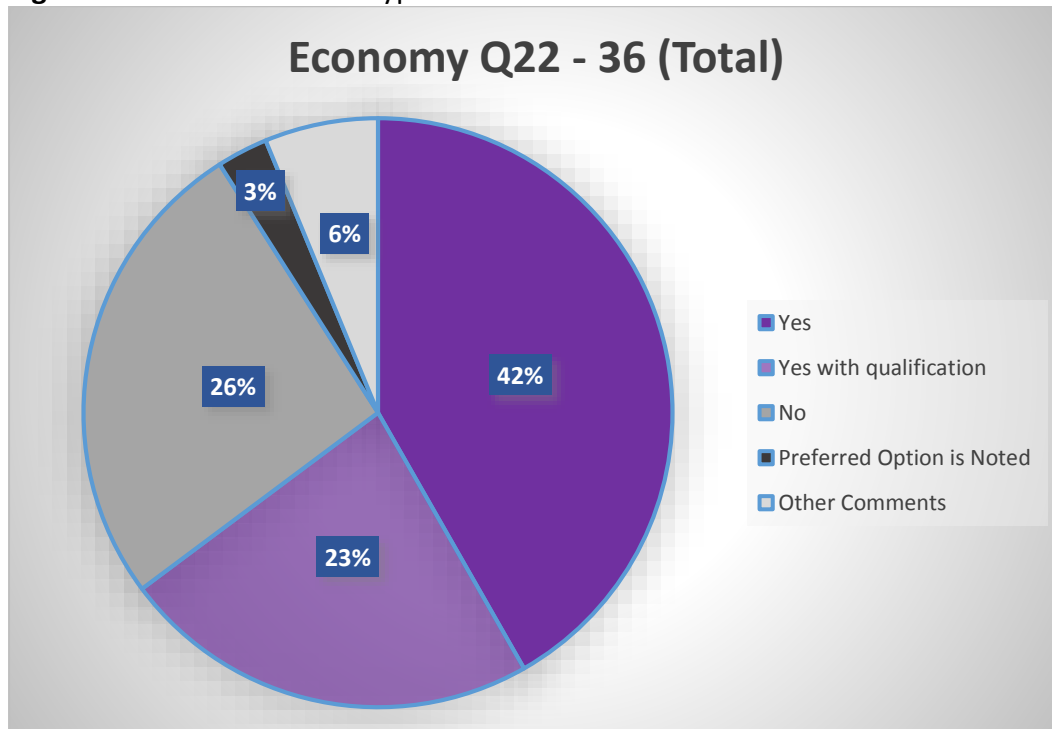
SOCIAL OPTIONS AND COMMENTS (QUESTIONS 14-21)

Figure 3: Breakdown of the type of comments received.



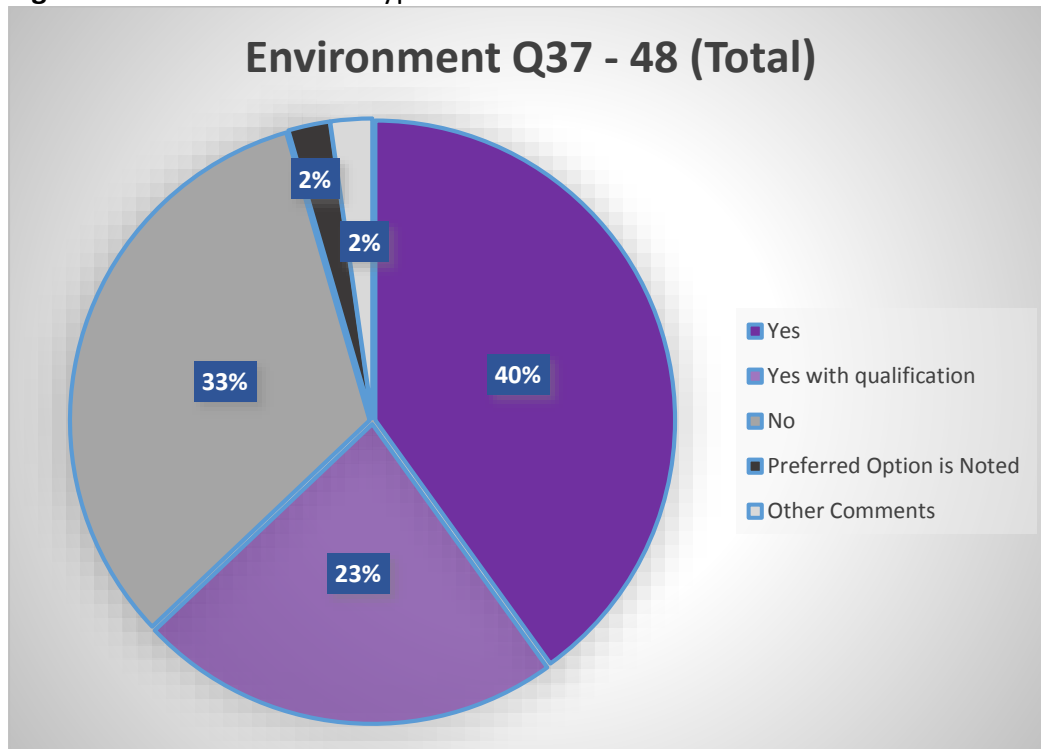
ECONOMY OPTIONS AND COMMENTS (QUESTIONS 22-36)

Figure 4: Breakdown of the type of comments received.



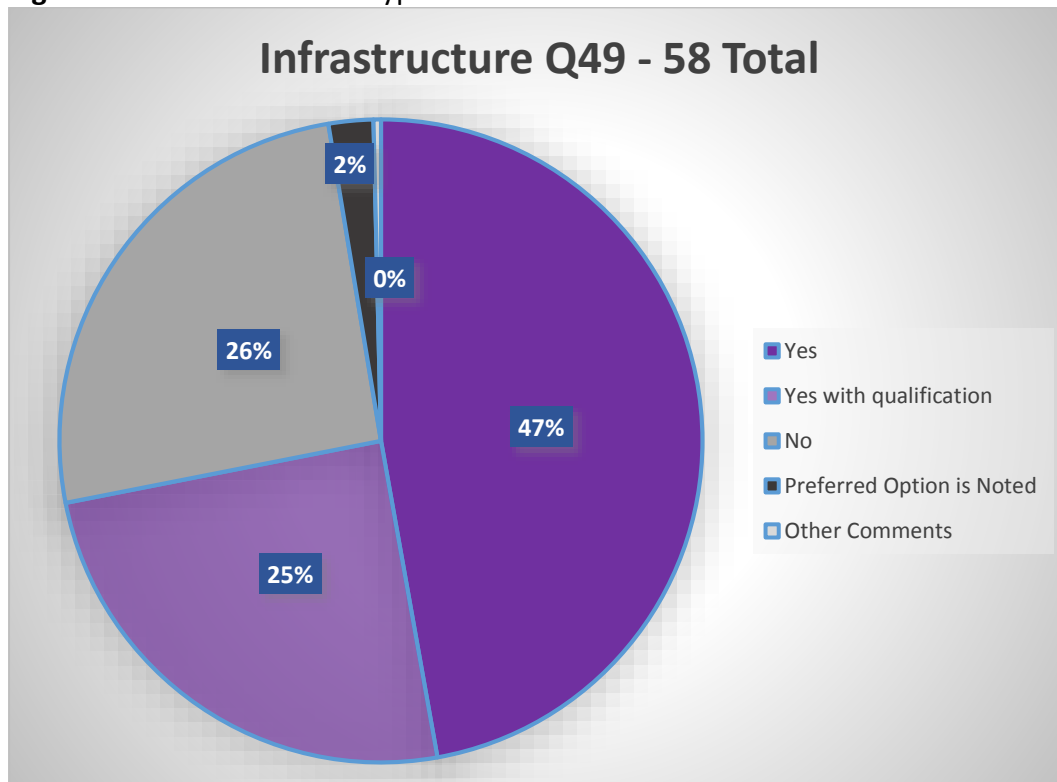
ENVIRONMENT OPTIONS AND COMMENTS (QUESTIONS 37-48)

Figure 5: Breakdown of the type of comments received.



INFRASTRUCTURE OPTIONS AND COMMENTS (QUESTIONS 49-58)

Figure 6: Breakdown of the type of comments received.



5.0 KEY ISSUES NOT ADDRESSED IN THE POP (QUESTION 59)

5.1 In additions to the questions raised in the POP, the opportunity was given to respondents to provide comment on aspects they wish the Council to consider, which have not been included as a key issue in the document. The sections 5 & 6 (below) present a summary of these comments. The Dfl comments are set out separately to others as it is the overseeing authority.

Summary of Dfl’s response:

Degree of planning knowledge assumed	Second Homes issue not fully considered
Up-to-date evidence base required	Relationship between Position Papers and third party studies not provided
Pressure analysis maps – further details required	The Coast- no options offered
Rathlin Island Action Plan not mentioned	Local Transport Plans to inform LDP
Possible additional Objectives and Options	Project Kelvin - Impacts
Filling Stations – guidance to issue	Data analysis and Accessibility Analyses not used
‘Sustainable Water – A Long-Term Water Strategy for NI’- implications	Proximity to reservoirs policies/Revised flood maps available (epoch date of 2080)

Summary of Other Responses:

POP content and layout	Important material considerations
Village Plans not mentioned	Spatial Growth issues
Ulster University: Surplus lands and expansion	HSENI – statutory consultee
Minerals policies	Armoy Village – car parking and housing
Historic Environment – relationship with other issues	Protection of World Heritage Site v. living and or working there
Rathlin Island issues	Sustainable Tourism
Renewable Energy provision	Impact of Climate Change
Countryside Development	Housing
Transportation	Woodlands and Forestry

6.0 OTHER MATTERS RAISED

POP content and layout	LDP & Community Plan relationship
Adjoining council co-operation	Availability of housing land
Acknowledgement of Forestry Planning Areas	Requests to zone land or amend existing Settlement Development Limits
Comments on existing designations	LDP must take account of SPPS revisions
Mixed use development policy required	Amend text on climate change
Review mineral policies set out in PSRNI	Reflect SPPS accurately
Cam Quarry	Strategic approach to cross boundary peat extraction
Impact of upward population trend (NISRA) on existing services and infrastructure, particularly housing	

7.0 COMMENTS ON THE PLANNING POLICY REVIEW

DfI Response:

DfI Research reports (Development in the Countryside/Renewable Energy)/Preparatory work on NI Regional Infrastructure Delivery Plan (2040)	DfI guidance on translating policies into LDP
Note and agree comments at Table 21 - welcome further discussion	Not all PPS 13 General Principles carried through to SPPS
Proposed amendments not clear	

Summary of Other Responses:

Extend LDP date to 2035	Second homes issue
Housing projections – adjoining council plans, unexpected growth & greater flexibility	PPS 2, policies NH1 to NH5 not addressed
Areas of High Scenic Value, Local Landscape Character Areas and Urban and Rural Landscape Wedges	The role of Riverside not properly considered
Ensure protection of sufficient mineral resources and materials to deliver the LDP vision and objectives	

8.0 COMMENTS ON THE SUSTAINABILITY APPRAISAL (SCOPING & INTERIM) REPORTS

Summary of DfI's response:

Test policy options through SA and provide evidence	Broad thrust and direction of current operational planning policy and supplementary guidance generally acceptable - no evidence to suggest substantial amendments required
Proposals to carry forward existing operational policies to be tested through SA	

Summary of Other Responses:

SCOPING REPORT

Topic Area: Minerals

SA/SEA lacks sufficient detail or accurate evidence (envisaged in SPPS) for a robust assessment	Accurate socio-economic and environmental Borough profile required
Joint approach with neighbouring Councils	Not broad strategic alternatives

Topic Area: Historic Environment

Up to date evidence	Add HED to List of Abbreviations
Lack of reference	Overlap with many other topics
ASAI at Banagher	Areas of Archaeological Potential identified rather than designated through LDP
APPENDIX 3 Compatibility re: Sustainability Objectives	Reference to European Convention on Archaeological Heritage is inaccurate
Take account of Granada Convention	Historic Monuments and Archaeological Objects Order - specific implications re: zoning
Key issues: highlight actual issues not statistical facts	Meaningful indicators
Establish key sensitivities of protected sites to ensure needs reflected the Plan	Employ effective avoidance techniques, as opposed to mitigation measures
Full protection to both designated and non-designated sites important for wildlife and biodiversity	Fauna of Lough Foyle, Sheep Island and Rathlin Island
Section 6, SA Framework, items 12 & 13 re obligations	HRA includes a 15km zone of influence (trans-council and trans-border) European designated sites

Topic Area: Transport and Accessibility

Air Quality Management Areas (AQMAs) - important link between air quality and human health	
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Topic Area: Neighbouring Council Plans

No reference to existing or evolving neighbouring Plans re: cross boundary designations or coastline	
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Summary of other Responses:

INTERIM REPORT

Topic Area: Historic Environment

Appropriate and effective mitigation measures must be put in place, particularly for objectives 10 & 11	Concerns re some inconsistencies and inaccuracies in relation to scoring the historic environment objective
Concerned that intertwined relationship of historic environment to landscape character and natural environment not recognised across much of the scoring	'Not Allocated' and 'Record Only' references
Recommend clearer articulation of potential mitigation measures to illustrate how impacts are offset (where and if they can be)	Greater recognition of potential negative effects of development on previously unidentified below ground archaeological remains and means of mitigation
Specific concerns raised in relation to Key Issues: SG2; SG 3; HS 1; OS 1; OS 3; ED1; RT2; TO1; MN2; MN4; CY1; CY 2; WH 1; TP 2; FR3; RN 1; DC1; and PU1	

Topic Area: Minerals

Information is of limited value	SA lacks sufficient detail or accurate evidence (envisaged in SPPS) for a robust assessment
Concerns regarding selection and rejection of reasonable alternatives to deliver Minerals Policy Options (MN1 and MN2)	Accurate socio-economic and environmental Borough profile required
Joint approach with neighbouring Councils	Not broad strategic alternatives

Topic Area: Renewables

Consider future energy demands for Borough	Absence of baseline information has implications for the SA
Balance between meeting social energy supply needs of the region, economic and environmental costs of importing energy and gas	

9.0 COMMENTS ON THE EQUALITY SCREENING: INTERIM PROGRESS REPORT

9.1 The Council received no responses relating to the published Interim Progress Report.

10.0 CONSIDERATION

Initial Public Consultation Outcomes

10.1 The POP process has been beneficial in that it has highlighted the following:

- Areas of work that require further consideration;
- Matters that would benefit from further clarification;
- Issues that are particular to the local community;
- Additional sources of information beneficial to the plan process; and
- Administrative issues that should improve the subsequent stages in the plan's production.

10.2 The future LDP work programme will focus on an analysis of the issues raised to the POP, including liaison with statutory consultees, and respondents (where relevant). New data sources, including relevant NISRA research and the Council's proposed Landscape Character Assessment, will also help inform the preparation of the draft Plan Strategy.

10.3 Following completion of this work, a further Public Consultation Report will be prepared to comply with the Council's Statement of Community Involvement, and with the Planning (Local Development Plan) Regulations (NI) 2015, Regulation 11(4) which states that, with regard to consultation on the POP:

"A council must take account of any representations made in accordance with paragraph (2) before it prepares a development plan document."

