



Local Development Plan Team

Newry, Mourne and Down District Council
Council Offices
Downshire Civic Centre
Downshire Estate
Ardglass Road
Downpatrick
BT30 6GQ

23rd August 2018

By Post & Email

Dear Sir/Madam

Re: Newry, Mourne and Down District Council - Preferred Options Paper (POP)

Retail NI welcome the opportunity to respond to the Council's, Preferred Options Paper (POP) consultation and can confirm we have considered the document in full.

Presently some aspects are more relevant than others, so we reserve the right to make future comments as the LDP progresses and elaborate on the initial points raised in this submission.

I must highlight at this juncture that the lack of a Retailing & Town Centres Section in the POP, does raise considerable concerns for Retail NI and undermining the robustness of the POP document. The entire document is silent on the Council's approach to retail, leisure and main town centres uses. This is unlike any of the other Council's POP documents.

Part 1 - Introduction

1. A good LDP will lead to consistent decisions, whilst ensuring people understand where development will be promoted and accepted. This will also provide a greater level of certainty for investors, communities and the public.
2. This approach would accord with the general functions of the Planning Act (NI) 2011 in respect of the general assembly and orderly development of land and buildings. It also means that the Plan will operate in the public interest and that of the District, as a whole.
3. It is noted that the purpose of the POP is to promote and stimulate debate on key issues and to encourage feedback from a wide range of public, community and key stakeholders, which will help to inform the next stage of the LDP and set out the vision, strategy and objectives for the District.
4. Although the plan covers a significant time period (until 2030), no plan can take account of future trends, emerging issues or the myriad of scenarios that will occur over its life and nor should it try. It should evolve as it progresses. The statutory requirement to monitor and review the plan every 5 years will ensure it remains responsive, appropriate and sound.
5. Whilst growth and prosperity are key priorities and should be promoted. They should not be at the detriment of the many existing businesses and environmental designations within the District. The LDP provides the opportunity to adopt a joined-up approach and focus on "place-shaping".



6. The LDP will contain one document;
 - **Plan Strategy** – Overall objectives and strategic policies for managing sustainable development and growth across the whole council area.
 - **Local Policies Plan** – Formulation of a set of local policies, which should consider the Plan Strategy and how it can be delivered.
7. There may be proposals that comply with the more detailed policy tests in the Local Policies Plan, but do not comply with the overarching and potentially competing objectives in the Plan Strategy. This would be expected and should not necessarily render a proposal unacceptable.

Part 2 – District Profile

1. This Section provides a broad overview of the demographics, economic profile, environmental characteristics and travel patterns of the District.
2. It is noted that the population is set to increase by 9.7% over the plan period and that a high proportion (35%) live in the countryside. This is reflective of the rural nature of the District, which relies heavily on the land for agriculture, mining/quarrying and tourism. Fishing is also a significant contributor to the economy and Warrenpoint Harbour provides a gateway to Britain and Europe for import and export of freight. The ports potential for leisure and tourism activities has not be realised to date and provides an area for growth over the life of the Plan.
3. Whilst it is acknowledged that engagement with neighbouring Councils will take place on cross-cutting matters. There is no specific commentary on transboundary issues. Given the District shares a land border with the Republic of Ireland and has the Province's second busiest port. Taking account of the implications of Brexit there is little cognisance of the impacts. The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2015 apply and will consider neighbouring EEA States and the potential for environmental impacts, but from an engagement perspective, the Council should engage with member states.

Part 3 – Regional and Policy Context

1. There are no significant comments relating to this Section, as it identifies the relevant Regional and Local Strategies, Prevailing Regional Planning Policies and Supplementary Planning Guidance documents.
2. However, account should be had for emerging documentation from the Department for Infrastructure (DFI). Specifically, the review of planning policies on renewable energy and development within the countryside following the release of the Strategic Planning Policy Statement (SPPS) for Northern Ireland. This review is expected to be completed in 2018 and should be considered as it will be the latest expression of policy on these aspects from Central Government.
3. Whilst we are in a plan led system it is noted that there are several inconsistencies in the extant Development Plans, due to their vintage and when taking account of the new Council boundaries. The District is still covered by BNMAP 2015 and ADAP 2015, which although past their notional end date are relatively recent LDPs when compared to the other development plans across Northern Ireland.



Part 4 – Vision & Strategic Objectives

Vision

1. The LDP Vision is long and could be revised to simply;

“Newry, Mourne & Down is a safe, vibrant and diverse place to live, work and visit, with opportunities for all”. This revision would be clear, precise and inclusive.

2. We fully endorse that the LDP must take account of the Community Plan – the Strategic Growth Plan (SGP). There is a degree of overlap with the Community Plan, but not a direct correlation. These areas are then expanded upon in more detail in the Strategic Objectives and Preferred Options that follow.

Strategic Objectives

3. We agree with the overall thrust and direction of the principles and that they are broad expressions of how they will seek to facilitate the plan Vision and the more detailed policies that will follow.
4. There are three broad and overarching themes that will support the delivery of the LDP and Vision. We agree that no one area shall be regarded as having priority over the other. The themes interrelate and accord with the principles of Sustainable Development;

Social

- The nine objectives are balanced and seek to accommodate people and facilitate communities by focusing on Newry City Centre as the gateway and Downpatrick as a main hub.
- The RDS has already classified the main urban areas in the Borough, attaching weight to their size, role, strategic location. We agree that the LDP needs to accommodate growth across the Borough over the plan period. This should be commensurate with their place in the settlement hierarchy
- We fully endorse the need to protect and consolidate the role of local towns and villages. The provision of local centres and services will reduce the need for travel and promote social interaction for the ageing members of society, such services are the life blood of communities and must be robustly protected.
- A mixture of new homes in accessible locations around the District will assist with the future growth and regeneration plans. The Demographics indicate that the population is varied and account will need to be taken of the variety and location of housing allowing for fluctuations in age groups.
- New housing schemes over a specific threshold should include community facilities such as retail, health, shared amenities and leisure to reduce the need to travel and include high quality amenity space.
- Open space should be accessible to all and without the need to travel by private car. It should also be of sufficient quantity and quality in new housing developments to provide a positive outlook and assist with aspects of health and well-being. Open space should be viewed as an asset entrusted to all and as a way of improving the visual amenity of the area.



Economic

- The objectives focus on creating jobs and promoting prosperity in the District. Whilst inward investment from new business is key to creating growth, it should not be prioritised over the investment of existing businesses in the District.
- Retail NI is supportive of objectives and policies that encourage existing and new businesses to invest and grow in the District, particularly those that support, regenerate and promote vibrant Towns and City Centres, Villages and Small Settlements.
- To be sustainable, sufficient land must be provided for economic development at a variety of locations across the District and this must be considered in conjunction with the existing settlement hierarchy and available infrastructure.
- Existing employment land must be given strong policy protection to avoid it being lost to other unfettered development uses. Regard would need to be taken of the existing floorspace and “headroom” available through extant consents.
- The creation of 9,213 new jobs by 2030 is ambitious, but achievable and can be assessed as part of the ongoing monitoring of the plan. There is no detailed breakdown of which sectors or industries that will provide for new employment. This information is critical in considering where site specific locations are required along with expansion or re-development of existing sites, so that they are accessible to all.
- Business “Start-Ups” and “Homeworking” are crucial in the rural area as they prevent car travel and contribute to the local economy. Suitable policies are required to support small scale enterprise. In the urban area “knowledge” based industry enables local companies to operate in a global marketplace. These should be located close to the Newry City Centre where there are good transport links to the ROI and beyond.
- The regeneration and reuse of existing buildings or previously developed land is sustainable and provides opportunities to enhance the quality of the environment, whilst providing flexible space for new businesses at a choice of locations.
- Newry City Centre needs to be the catalyst for regeneration and growth given its role and connectivity. It must continue to be the first location for business, retail, tourism, education and leisure given its accessibility and function on the Belfast – Dublin economic corridor. Brexit creates potential growth for Newry as gateway city with Europe and as a major hub.
- The plan 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.

Infrastructure & Environment

- These objectives consider the conservation, protection and enhancement of the environment through positive placemaking, improved infrastructure and protection of the built and natural environment. These aspects will improve public health and reinforce the unique natural assets of the District.
- The emphasis is to enhance the connectivity and infrastructure within the District, whilst sustaining and protecting the areas of high scenic value and built heritage.



- By ensuring the focus is on all elements, there will be significant benefits to the quality of the environment that will improve the economy and society for those that live and work in the District.
 - A joined-up approach to transport and development needs to be implemented in the LDP. The clustering of business and services at strategic locations on the transport network is critical in encouraging linked trips, car sharing and park and ride facilities, which will reduce car usage and journey times throughout the District.
 - The protection and enhancement of existing open space and the provision of new open space promotes active and healthy lifestyles and the conservation of biodiversity, which contribute to sustainable development.
 - The provision of green infrastructure and community space is critical in promoting active travel and providing a shared space. Highly quality sports facilities, 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.
5. The objectives seek to cover all the necessary areas and are clear in what they wish to achieve. They are then connected to each preferred option that follows.
 6. We agree with the thrust and direction of the Strategic Objectives. They are broad expressions of how they will facilitate the overall LDP Vision. The focus is evenly split across the three areas and they interconnect.

Part 5 - Spatial Growth Strategy

1. We agree that to inform the Spatial Growth Strategy (SGS) account must be taken of the existing evidence base in the RDS 2035, existing development plans and that additional robust evidence is required to define an up-to-date settlement hierarchy within the District. Decisions about growth and allocation of development can only be reached in an up-to-date evidential context.
2. Consideration of unimplemented planning permissions must occur in conjunction with an audit and review of these consents. This will enable an understanding of future growth areas, demand and supply, given the predicted population increase of nearly 10% over the plan period.
3. Retail NI supports the use of a settlement hierarchy, which is aligned with the RDS and classifies the Main Towns in the Borough, attaching weight to their size, role and strategic location. The LDP needs to accommodate growth across the District over the plan period and in accordance with the distribution at each Tier. Future growth must be proportionate to the size, scale and strategic function of each Tier in the hierarchy.
4. It is accepted that larger settlements, due to their critical mass should have a higher order and range of employment, services and infrastructure and are best placed to accommodate growth. However, there is also a strong rural community, which needs to be supported by vibrant villages and small settlements. In villages and small settlements appropriate flexibility is required to accommodate demands and support dispersed rural communities, whilst protecting the countryside.



Key issue 1 - Settlement Hierarchy

5. We agree with the need to define an up-to-date settlement hierarchy within the District and that it should inform decisions about growth and development. The evidence base and approach advocated in paragraph 5.14 is logical and sound.
6. The re-classification of existing settlements reflects the changes that have occurred during the intervening period and provides greater consistency, as some of the extant plans, were formulated prior to the RDS and HGIs.
7. This approach also accords with the distribution across the settlement hierarchy, which is heavily weighted towards Tier 3 - Villages (28) and Tier 4 - Small Settlements (52). Although lower down the hierarchy the re-classification within the hierarchy enables sustainable long-term growth of the Local Towns & Hubs at the higher Tiers. As it will facilitate localised growth and a provision of services of an appropriate scale to reduce the need for travel. The focus on Newry and Downpatrick as the main hubs in the District is logical and accords with their size, scale and potential for growth.
8. To be sustainable, sufficient land must be provided at a variety of locations across the District and this must be considered in conjunction with the existing hierarchies. Proposed housing growth will act as a catalyst for employment growth in retail, industrial and the service sectors.
9. The preferred Option 3 is logical, and we endorse the full evidenced based review and proposed reclassification.

Key Issue 2 – Quantity of Housing Land

10. The first step is to calculate the total number of dwellings in the Council area over the plan period and then to allocate them. It is accepted that this process is not an exact science and different assumptions can produce significant variations. We agree that the target is an indicative figure and not is not to be rigidly adhered. In any case it will be kept under review as part of the ongoing monitoring of the plan.
11. We agree with the housing allocation as proposed in the preferred Option 1, as it takes account of the HGI figures and 2011 Census data. We agree that the council should consider policies and mechanisms to deliver balanced communities and meet housing need/demand. In reviewing the housing land, it must ensure that growth is directed to appropriate Tiers in the hierarchy. A phased approach enables consideration of the short-term land reserve (STLR) to meet any are of need.
12. There is a considerable amount of zoned housing sites that have still to commence, whilst these unimplemented sites create an oversupply in specific areas we agree that there should be no de-zoning of housing land given the low build rates following the recession. This should be reviewed and if sites are not progressed, it may be appropriate to re-visit this aspect.
13. The LDP will be monitored and reviewed and can take account of any required changes over the period of the plan. It can therefore adjust taking account of the demands of the District over the life of the plan.

Key Issue 3 – Distribution of Housing Land

14. A threshold of 5,000 population is used to define a large town at Annex E of the Addendum to PPS7 – Safeguarding the Character of Established Residential Areas. This threshold is also referenced at paragraph 3.17 of the RDS 2035 and paragraph 6.134 of the SPPS, so is a suitable benchmark for measurement.



15. It may also be appropriate to consider the movement of several of the larger Tier 3 - Villages, which can accommodate growth into Tier 2 – Local & Small Towns and larger Tier 2 - Local & Small Towns into Tier 1 – Main Towns. This will ensure the 60% target in the RDS is met by focusing housing in small towns and main hubs.
16. We agree with the housing allocation as proposed in the preferred Option 3 is logical and directs growth in the main hubs. It takes account of the HGI figures and 2011 Census data. In maintaining the allocation to Local Towns, it ensures that growth is directed either above or below in the hierarchy. This is especially relevant given the distribution and the significant rural community.
17. The LDP will be monitored and reviewed and can take account of any required changes over the period of the plan. It can therefore adjust taking account of the demands of the Borough over the life of the plan.

Key Issue 4 – Quantity of Employment land

18. The planning process is a key enabler of economic growth, by ensuring an ample supply is available at the right strategic locations. It is accepted that different types of industry and land uses have a variety of development and operational needs.
19. Retail NI endorses the approach of undertaking a full audit and review of the existing employment locations to determine land availability and demand. However, would have reservations in respect of the release of employment land for other uses and specifically for retailing or mixed-use development outside of designated centres.
20. Existing developed employment land must be given strong protection to avoid it from being lost to other inappropriate development uses.
21. Retail NI endorses Option 2 with the approach of uplifting the amount of zoned land by 20% to enable a range and choice of sites in terms of size and location to provide flexibility for the widest range of businesses.

Key Issue 5 – Distribution of Employment Lands

22. We agree with the overall thrust and direction of the Growth Strategy by focusing on improving and developing the road and port network whilst encouraging regeneration and investment in knowledge-based industries, education, retail and tourism.
23. It is agreed that different types of industry and land uses require different locations and development needs. It is acknowledged that there is still a significant amount of land zoned for industrial/employment use that remains undeveloped around the District. Likewise, several previously used sites have now become redundant or are unsuitable. The re-use of existing sites and buildings should be actively encouraged by the plan. It may be appropriate to issue “a call for sites” and seek to match business profiles with existing sites. This may result in the growth of Enterprise Zones to encourage new economic development and regeneration of existing underutilised employment sites.
24. Smaller and older sites may be more suitable as potential redevelopment opportunities for alternative uses. This would need to be considered on a site-specific basis, dependant on a clearly identified need and that the proposals being sought are committed developments rather than speculative.
25. In cases of Major Employment locations, these should be at strategic locations, near transport intersections. In other locations of existing employment, growth must be considered based on the



available floorspace and the ability to organically grow over the life of the plan. This would need to be considered on a site-specific basis and requires an understanding of future requirements.

26. We agree with the balanced apportionment of economic development lands, as proposed in the preferred Option 2 as it allows for an even distribution of growth across the settlement tiers and this will be beneficial to the widest range of businesses.

Part 6 – Social

Key Issue 6 – Social Housing Need

1. We agree with Option 4 encouraging developers to provide an element of social housing as part of larger developments of 50 units is logical and will enable an even distribution throughout the District. It also ensures that larger schemes remain financially viable and is a more inclusive method of delivering housing for all.

Key issue 7 – Housing in the Countryside

2. The approach must be to strike a balance between providing appropriate development opportunities and despoiling the countryside with development that is inappropriate in scale or location. Account will need to be taken of the existing rural communities needs and the ability of the landscape to absorb new development. The re-use of existing buildings is clearly sustainable and minimises the impact on the landscape. It should be actively encouraged where suitable.
3. Retail NI supports Option 2 in relation to housing in the countryside. The approach accords with the policy provisions of PPS 21, but enables clarification of specific wording and the ability to refine the policies for more localised circumstances.

Key issue 8 – Future proofing and housing for all.

4. We agree with Option 3 to adopt policies to encourage lifetime homes and wheelchair accessible homes, so that there is suitable housing for all members of the community.

Key issue 9 – Integrated renewable energy and passive solar design

5. We agree with Option 3 to adopt policies to encourage the integration of renewable energy, passive solar system and other forms of micro-generation in both a small-scale domestic capacity and on larger commercial buildings to achieve energy gains and reduce running costs.

Key issue 10 – Open Space Provision

6. Open space is taken to mean all open space of public value, including not just land, but also inland bodies of water such as rivers, canals, lakes and reservoirs which offer important opportunities for sport and outdoor recreation and can also act as a visual amenity. It therefore performs a passive and active function, as well as being formal and informal.
7. The protection of existing open space and the provision of new open space promotes active and healthy lifestyles and the conservation of biodiversity, which contribute to sustainable development. The provision of green infrastructure and community space is critical in promoting active travel and providing a shared space. Highly quality sports facilities, defined walking routes and positive use of inland waterways and coastline creates opportunities for leisure and tourism and should be evaluated, upgraded and expanded as part of the plan process. Retail NI supports preferred Option 2 in relation open space.



Part 7 – Economic

Key Issue 11 – Economic development in the Countryside

1. The approach must be to strike a balance between providing appropriate development opportunities and despoiling the countryside with development that is inappropriate in scale or location. Account will need to be taken of the existing rural communities needs and the ability of the landscape to absorb new development.
2. The re-use of existing buildings for economic development and tourism is clearly sustainable and minimises the impact on the landscape whilst utilising existing infrastructure. It should be actively encouraged where “suitable” buildings exist to support rural businesses and communities.
3. We fully support Option 2 to ensure economic development can be facilitated within the countryside in sustainable locations to promote vibrant rural communities across the District. The existing policies and regional direction promotes economic development in a positive manner, which sustains and enhances the environment.
4. Retail NI agree that clarification and tailoring of specific policies will enable flexibility to be applied to local circumstances. However, the decision taker can already achieve this taking account of the site-specific nature and material circumstances of each case and through existing policies, which enable diversification for business purposes in conjunction with existing agricultural activities.

Key Issue 12 – Alternative uses on land zoned for Economic Development

5. Re-classifying the use of existing zoned economic development land is an issue faced by all the Councils Areas across Northern Ireland, as there is an oversupply in existing development plans. The plans did not take account of the demise of quality manufacturing in the Province for cheaper overseas imports.
6. There have been unfettered uses permitted on existing zoned economic lands over the last decade, which does not assist in supporting town centres or ensuring an adequate supply of economic land continues to meet current and future demands.
7. We agree with Option 2, which allows for alternative economic and business uses on these lands. However, a precautionary approach, must be adopted when considering proposed “*sui generis*” uses, as the sale and display of motor vehicles has consistently been viewed as a form of retailing by the PAC.
8. To include “*sui generis*” uses, could be open to severe manipulation, which would not accord with the intention being sought to enable flexibility of suitable business uses. This requires further consideration and careful wording.

Key issue 13 – Tourism Development

9. The plan needs to ensure that a range of Hotel accommodation and bed space is provided for all tourists throughout the District and that it is accessible to all. Whilst the Plan cannot be too prescriptive, committed and future developments should be considered and located at strategic locations accessible to transport hubs to reduce the need to travel to locations by private car.



10. The plan should support and create significant tourism destinations and increase focus in outdoor activities, culture, arts, live music scene and sports, which creates identity and vibrancy and gives people a purpose for travelling around and staying in the District for longer.
11. The promotion of events or annual festivals will attract tourists, along with a range of world class activities, which enable the natural environment and tourist assets to be showcased. A diverse mix of activities will enhance the area as a top tourist destination and encourage growth of both local, regional and overseas visitors. Retail NI is supportive of the preferred Option 2 and the implementation of Tourist Opportunity Zones.

Key Issue 14 – Minerals Development

12. Retail NI supports preferred Option 3 and the balanced approach. This seeks to promote mineral development in sustainable locations with a focus on the protection of the environment through evidence-based applications. 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.
13. Restoration is critical to mitigating the impacts on the landscape in Areas of High Scenic Value (AHSV) and in vulnerable landscapes when development has concluded. This has been undertaken very successfully in the mainland UK, where sites have then become wetlands and reservoirs for wildlife following mineral extraction and have enhanced biodiversity.

Key Issue 15 – Proposed Transportation Schemes

14. The importance of the protected routes and strategic transport corridors (A1, A7, A28, A2 and A24), can promote growth and future development along them and are fundamental to the District. We therefore fully endorse the preferred Option 2, as it retains significant flexibility, whilst safeguarding the existing strategic road network.
15. The importance and strategic role of transport corridors which connect the Districts towns, villages and small settlements must be sustained and enhanced where necessary. We agree that the LDP should make use of the planned infrastructure improvements for the benefit of the entire District.

Key Issue 16 – Park and Ride/Share Schemes

16. An integrated approach to transportation and development needs to be implemented in the LDP and the development of a strategic transport interchange should be examined. This will enable sustainable forms of transport within the District and beyond. This is especially relevant when considering that the primary mode of transport in the Borough will be by private car. Transport, car parking and land use needs to be considered collectively.
17. Retail NI supports Option 2 as the clustering of business and services at strategic locations on the transport network is critical in encouraging linked trips, car sharing and park and ride facilities and active greenways, which will reduce car usage and journey times throughout the District. Therefore, existing park and ride facilities should be maintained, and new sites identified in conjunction with the joined-up approach to economic development.

Key Issue 17 – Sustainable/Active Travel and identification of Greenways

18. The protection of existing disused transport routes in accordance with Option 2 enables the provision of green infrastructure, which is critical in promoting active travel and providing a shared space. Highly quality sports facilities, 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.

Key Issue 18 – Renewable Energy

19. The approach to strike a balance between providing appropriate Renewable Energy development opportunities and despoiling the countryside. Development that is appropriate in scale or location, should be actively encouraged. However, account will need to be taken of the ability of the landscape to absorb new development and the impacts on amenity. Retail NI endorses Option 1 as it reflects current regional policy and seeks to identify the most vulnerable and sensitive landscapes unsuitable for development.

Key Issue 19 – Telecommunications

20. We endorse Option 1 to adopt existing policies within PPS10 and regional direction regarding the delivery of broadband to the rural area.

Part 8 - Environmental

Key Issue 20 – Conservation Areas and Areas of Townscape Character

1. The Plan should seek to 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 District.
2. The review of the existing Conservation Areas (CA) and Areas of Townscape Character (ATCs) is prudent given when they were designated and the changes that have occurred to the built environment in over the intervening period. This will ensure integrity of the designations and the characteristics that ought to be protected in the public interest.
3. If adjustments and re-classification occur, then design guidance should then be produced for all remaining Conservation Areas (CA) and Areas of Townscape Character (ATCs) to assist with guiding development. Consideration should also be had to the delivery of increased housing in such areas without negatively impacting on their distinct characteristics.
4. In specific situations, the withdrawal of permitted development rights to preserve the character and appearance of the area, should be considered to retain control. The preferred Option 2 is logical and will enable protection without inhibiting development in areas, which are no longer worthy of designation.

Key Issue 21 – Non-Designated Heritage Assets

5. Protecting heritage assets in accordance with the RDS and prevailing policy will ensure the District maintains its distinctive character and rich history, which can be critical for attracting tourism and a sense of place in neighbourhoods.
6. The protection of the heritage assets with development pressures is a balancing act. It is critical that statutory agencies work with developers to bring historic buildings back into circulation to deliver for the District's growing needs. Future policies must facilitate such an approach to prevent buildings being lost and to act as a catalyst for areas to be regenerated.



7. A realistic approach needs to be adopted to historic and vernacular buildings, which does not just seek to maintain them, but allows sufficient flexibility to bring them back into use and enhance them for modern use. This will involve appropriate and sympathetic changes to their fabric. Preferred Option 1 strikes a balance and is endorsed.

Key Issue 22 – Sensitive Upland Landscapes

8. The Council should implement adequate policies to protect designated areas from unnecessary or inappropriate development, so that they can be enjoyed by future generations. A precautionary principle should be applied to the most sensitive areas.
9. The plan should seek to 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 District.
10. Environmental Protection must be considered as there is a significant emphasis on the impacts that development can cause. We endorse Option 3 and the review of the existing designations. However, would advocate flexibility to provide for limited opportunities of an appropriate scale where it has been demonstrated that the development impacts are negligible on the landscape asset.

Key Issue 23 – Coastal Erosion and Land Instability

11. We agree with Option 3 to adopt policies, which carefully protect but also retain an element of flexibility.

Key Issue 24 – Flood Risk Management

12. We endorse the preferred Options 2, as this reflects current regional policy in PPS15 and adopts a precautionary principle in the absence of full scientific certainty, as there is no assurance that the development will not cause environmental harm.

If you wish to discuss any of the responses in this submission, then please do not hesitate to contact me.

I look forward to receiving future correspondence as the LPD process progresses.

Yours sincerely

Andy Stephens
BA Hons, MSc
Planning Consultant

CC. Mr Glyn Roberts - Chief Executive, Retail NI
Mr Nigel Maxwell – Chairman of Retail NI