

**ANBC Local Development Plan Draft Plan Strategy – Belfast Hills Partnership Response – Sept 2019**

Belfast Hills Partnership (BHP) welcomes the document as a positive approach to planning for Antrim and Newtownabbey in the coming years. We have a few comments to make outlined below, some of which are reinforcing what has been submitted previously.

One key comment which we would make is that we strongly believe that the designation of an Area of High Scenic Value (AHSV) should be retained in addition to the use of Landscape Character Areas. An AHSV designation can highlight what is locally highly important whereas by definition and design Landscape Character Areas cover all of Northern Ireland's land, not those areas of high value.

Pg 174 section 8.11. BHP welcomes that the protection of open space applies whether or not there is public access. There are huge landscape, aesthetic, biodiversity and natural capital benefits of open space including areas with no public access.

Our research into site users suggests that walking and enjoying the landscape are key reasons that people access public open space, while often much greater resources are spent on creating formal amenities which can negatively affect biodiversity and only benefit a small number of users. Care must be given in ensuring natural spaces are not considered of secondary importance when considering any new developments.

Pg 176 section 8.20. We welcome the wide range of green spaces listed as part of the open space but believe that Local Nature Reserves be included in this as well.

Pg 247 section 11.30. We welcome this protection but believe that the word 'unacceptable' in DM39.1 is not used properly in this context. Unacceptable must mean unacceptable i.e permission refused. Major impact, however, would make more sense here. Whether this will work to protect these key assets will entirely depend on the quality of information and mapping available, as well as how the value of the habitat, species or feature will be determined to make a sound judgement of what mitigation measures would be acceptable.

Pg 248 section 11.34. We welcome the acknowledgement of the importance of preventing habitat fragmentation when considering planning applications. Rigorous procedures to assess the potential for this are essential but will only be as good as the mapping and database for habitats supplied to planners.

Pg 251 DM40.2. The sizes quoted are very substantial, given that even smaller structures would still have a major landscape effect. We would ask that options to seek proportionate visual impact and landscape impact analysis are available to planners for a second tier of lower areas and heights. This could be at their discretion through a formal assessment process. Proposed developments within an Area of High Scenic Value (AHSV), for instance, could be subject to this second tier of areas and heights.

Pg 251 DM40.5. The specific mention of Carnmoney Hill is much appreciated – we believe that it should also be listed that the developments must not have an adverse impact on the natural or historic environment of the site.

Pg 273. DM45.5. We would strongly suggest that the location of the wind farms would take into consideration an Area of High Scenic Value (AHSV) designation.

Pg 296. Artificial Modification of Watercourses. We warmly welcome the Council “making space for water” and will view applications for culverting negatively.