



**Armagh Banbridge & Craigavon
Borough Council**

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Antrim & Newtownabbey Borough Council
Forward Planning Team
Mossley Mill
Carnmoney Road North
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Our Ref: COR 2730 / ANBC DPS

Date: 4th September 2019

Dear Sharon,

**ANTRIM & NEWTOWNABBEY BOROUGH COUNCIL, LOCAL DEVELOPMENT PLAN
2030 – DRAFT PLAN STRATEGY**

Armagh City, Banbridge and Craigavon Borough Council welcomes the opportunity to comment on Antrim and Newtownabbey Borough Council's (ANBC) Draft Plan Strategy and look forward to continued engagement as each of our councils respective plans are progressed.

In accordance with guidance issued by both the Department for Infrastructure and the Planning Appeals Commission in relation to representations and 'soundness' it is considered that the issues raised relate to the soundness tests below:

Consistency Tests

C4 Has the Plan had regard to other relevant plans, policies and strategies relating to the Council's district or to any adjoining Council's district?

Coherence and Effectiveness Tests

CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs neighbouring councils.

As you will be aware a number of key cross boundary issues have already been discussed at a strategic level, including protection of natural heritage and landscapes, greenways, environmental designations and mineral development. Whilst our comments attached at Appendix 1 primarily relate to these areas of common interest, comments are also provided on those matters where the Council considers that further clarification would strengthen your LDP.

I trust that our comments will be fully considered by your Council and welcome the opportunity to discuss these matters further.

Yours sincerely



Helen Stoops
Principal Planning Officer

On behalf of Damian Mulligan
Head of Planning

Appendix 1

NATURAL HERITAGE AND LANDSCAPE

- Given the location of our respective Boroughs the Council is particularly interested in the regionally significant resource of Lough Neagh and Lough Beg and environs.
- Strategic Policy 8 (pg 236). The Council has welcomed the active engagement with Antrim and Newtownabbey Borough Council on cross boundary issues referred to in Para 1.22 (pg 21) and would seek continued engagement, particularly in relation to the Lough Neagh and Lough Beg environs.
- The Council acknowledges and welcomes the inclusion of landscape as an integral part of Natural Heritage.
- Please note that ACBCBC are currently undertaking a review of its Landscape Character Assessments which will further inform the approach to landscape protection.
- The aim of Policy DM 40 (pg 250), Landscape Protection, is acknowledged to ensure the landscape resource and features are carefully considered in assessing all development proposals, irrespective of any landscape designation. The Council notes the introduction of this borough-wide landscape policy, which details matters to be considered in assessing development impact on the landscape. Additionally, the recognition of biodiversity improvement measures as a positive mitigation is acknowledged.
- The requirement of a visual impact assessment and landscape analysis with some categories of development proposals in policy DM 40.2 (pg 251) is noted. Council considers that it may be helpful that this requirement is supported by guidance or explanatory notes to ensure each assessment and analysis will address the appropriate landscape issues.
- The Council notes the introduction of a Strategic Landscape Policy Area around Lough Neagh and Lough Beg. Further clarification would be welcomed in relation to DM 40.1, DM 40.3 and DM 40.6, (pgs 250-252) will all three policies be applied to development proposals in the Lough Neagh and Lough Beg Strategic Landscape Policy Area?
- The Council also notes the further restrictions imposed in the Lough Neagh and Lough Beg Strategic Landscape Policy Area and would welcome further detail or amplification in relation to a number of restrictions, for example what is considered an appropriate extension or alteration and a low intensity recreational use? Does the phrase 'low intensity' also apply to tourism proposals?

MINERALS

- Policy DM 44 Mineral Reserve Policy Areas (pg 270) which safeguards mineral reserve policy areas is noted.

RENEWABLE ENERGY

- The Council acknowledges policy DM 45 (pg 271) and, in particular, it is noted that no wind turbines will be acceptable in the proposed Lough Neagh and Lough Beg Strategic Landscape Policy Area.
- Additionally, the approach for renewable energy development which considers natural resources including water courses and their quality is noted.

TRANSPORTATION

- The Council welcomes Strategic Policy SP 3.4 (pg 111) which promotes appropriate opportunities for the reuse of disused transport routes along with a presumption against development that would prejudice their reuse for transport or recreational purposes. This approach will ensure that opportunities to develop Strategic Greenways, which have been identified within DfI's Strategic Plan for Greenways, are maintained and reflects the preferred approach of this Council.