



Comhairle Ceantair
Lár Uladh
Mid Ulster
District Council

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Antrim and Newtownabbey Borough Council
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Date: 11 September 2019

Dear Sir / Madam,

Local Development Plan – Consultation on Draft Plan Strategy

I wish to acknowledge and respond to your recent consultation in accordance with Regulation 15 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

Mid Ulster District Council welcome this consultation and opportunity to respond to your draft Plan Strategy. As you are aware we have discussed a number of cross boundary interests as part of the Lough Neagh Forum. These are centred on Lough Neagh and Lough Beg and their environmental designations. They include,

- Protection of environmental assets and designations;
- Management of Minerals Development;
- Sustainable tourism development and
- Flooding

You will also recall from previous correspondence at the POP, that Transport and Connectivity - specifically the A6 transport corridor is also a matter of interest to both Councils.

This response is structured accordingly around those areas of common ground.

Antrim and Newtownabbey Borough Council's Draft Plan Strategy

Whilst not an issue discussed at the Lough Neagh Forum, it is considered pertinent to inform members of an overview of the growth strategy which sets out how the future growth of housing and employment will be accommodated within Antrim and

Newtownabbey Borough Council. This will help to set the context in which other common issues will be discussed.

Spatial Growth Strategy

The Draft Plan Strategy has laid out ANBC's position in relation to future growth as one which will focus almost 80% of new housing in the three largest settlements, Metropolitan Newtownabbey (40%), Antrim (28.2%) and Ballyclare (11.3%). The majority of which is likely to be delivered through existing commitments.

There will also be opportunities for development in the towns of Crumlin and Randalstown through existing committed development allocations in effort to consolidate their roles as key centres for housing, employment, facilities and services to support a growing population and its wider rural hinterland.

Opportunity will be provided in villages to sustain and maintain their roles as centres providing opportunities for housing and employment of an appropriate scale and character to individual settlements.

In small settlements and the countryside, appropriate growth will be supported in principle where they accord with the designations of the LDP in effort to sustain the Borough's rural communities.

In relation to economic land, ANBC will identify and safeguard a range of sites for industrial/employment activity and business use in the Local Policies Plan focussed on Metropolitan Newtownabbey, Antrim, Ballyclare, Crumlin, Randalstown, Belfast International Airport (BIA) and Nutts Corner. It will operate a 'Two-Tier' approach to the identification of land and premises for industrial/employment activity and its subsequent retention and protection from alternative use based on:

- (a) Strategic Employment Locations; and
- (b) Local Employment Sites.

We are supportive of this growth strategy as it is in line with the RDS which seeks to ensure an adequate supply of land to facilitate sustainable economic growth with the main focus of growth should be within the hubs.

With reference to retail development, we support the town centre first approach adopted by ANBC and the sequential test which will be adopted for any out of town centre retail development which is in line with strategic policy.

Lough Neagh and Lough Beg

The importance of Lough Neagh and Lough Beg (the Lough) is acknowledged through numerous international and national designations. The fact that Lough Neagh is the largest lake in the United Kingdom and Ireland, covering an area of 383km², sets it apart as a unique environmental asset. Lough Neagh and Lough Beg are both designated RAMSAR sites, an international designation aimed to halt the loss of wetlands. They are also designated 'Area's of Special Scientific Interest' (ASSIs) and Special Protection Areas (SPAs).

The protection of these environmental assets and designations, minerals development, sustainable tourism development and flooding in the context of the Lough will be discussed below.

Protection of environmental assets and designations:

ANBC have identified and designated Strategic Landscape Policy Areas (SLPA's) within their DPS. These comprise the Borough's most important landscapes recognised for their scenic quality and environmental value, which given their sensitivity to change, ANBC considers are worthy of protection from undesirable or damaging development. Strategic Policy 8: Natural Heritage, including SP 8.5 and 8.6 of ANBC's DPS designates Lough Neagh and Lough Beg including the shoreline as Strategic Landscape Policy Area's (SLPA's) and notes that the precise boundaries of SLPA will be brought forward at the Local Policies Plan.

This designation and strategic policy is supported by detailed management policy 'DM 37 Designated Sites of Nature Conservation Importance' which is proposed to afford protection to areas with International, National and Local designations. In addition policy 'DM 40 Landscape Protection' and notably section DM 40.6 gives additional control of development within the Lough Neagh and Lough Beg Strategic Landscape Policy Area.

Policy DM 40.6 is set out below for reference:

DM 40.6 Development within the Lough Neagh & Lough Beg Strategic Landscape Policy Area will be strictly controlled and limited to the following:

- (a) The appropriate extension, alteration or change of use of existing buildings;*
- (b) Low intensity recreational use or tourism proposals;*
- (c) Uses directly related to agriculture or forestry;*
- (d) Consolidation of existing development that integrates with its surroundings; and*
- (e) Proposals related to geothermal energy or the extraction of regionally important minerals which demonstrate a sustainable approach to development that will not impact adversely on the features or environmental assets of the Loughs or their environs.*

We welcome the designation of Lough Neagh and Lough Beg as a 'Strategic Landscape Policy Area' and we are supportive of the associated policies which demonstrate a commitment to uphold the protection of environmental assets and designations including, Lough Neagh, Lough Beg and their shoreline.

Management of Minerals Development

We note Strategic Objective 12 of ANBC DPS states, 'Ensure the responsible use of land and natural resources and promote sustainable energy production to mitigate and adapt to climate change.' In addition the strategic policy, SP 9: Natural Resources, specifically, SP 9.2 Minerals, part (c) which operates a presumption against minerals development that would affect SLPA's and sites of nature conservation importance unless it can be demonstrated, that there is a regional need for the proposed mineral that outweighs the importance of the site.

This is supplemented by working policies DM 43: Mineral Development which applies to mineral development generally, as well DM 40 Landscape Protection,

including DM 40.4 which addresses mineral development in designated SLPA's and DM 40.6 part (e) which refers to Lough Neagh & Lough Beg, our area of common ground.

We welcome the additional protection afforded to Lough Neagh and Lough Beg through SPLA designation and the associated policies and consider there is no perceived conflict in relation to MUDC's Special Countryside Area (SCA) designations. We do however seek clarification in relation to DM 40.4 and DM 40.6.

In essence DM 40.6 states that mineral development will be strictly limited to the sustainable development of regionally important minerals which do not adversely impact on the Loughs or their environs, by contrast, policy 40.4 provides circumstance whereby adverse impact could be permitted (in relation to the designated SPLA) if a regional need which outweighs the importance of the site is demonstrated and appropriate mitigation / restoration provided.

There appears to be some ambiguity in relation to the extent in which mineral development can take place on Lough Neagh and Lough beg. Given the sensitivities of the landscape, we consider it would be helpful, prior to the finalisation of the ANBC Plan, to determine whether a regional need for mineral development exists and if so appropriate provisions made.

For example, Mid Ulster District have adopted this approach by designating SCA's around the shores of Lough Neagh which introduces tight constraints on all development including mineral extraction in recognition of its landscape qualities and the international importance of this wetland. Whilst the shores are designated as an SCA and are therefore protected from extraction, the Plan has not introduced an SCA designation on the Lough, which has historically been used for sand dredging. This activity is subject to a regionally significant application being dealt with by DfI. MUDC will review the approach to extraction in light of the outcome of that application.

Sustainable tourism development:

We note Strategic Objective 5 which supports the development of sustainable tourism and enhanced tourism infrastructure.

It is acknowledged that tourism development is important to the local and regional economy and that Lough Neagh is a relatively undeveloped destination for tourists. It is therefore important to strike a balance between protecting our most sensitive environmental assets and designations and accommodating sustainable tourism development.

We support the provisions of policy DM 40.6 Development within the Lough Neagh & Lough Beg SLPA which facilitates low intensity recreational use or tourism proposals. In addition we welcome policy DM 9 Tourism Development which help to ensure high quality considered design and promote sustainable development.

Flooding

We recognise that local development plans have a key role in ensuring that future development is managed in such a way so as to reduce the risks and impacts of flooding and appropriate policies should be provided to address this.

We therefore support Strategic Objective 13: Tackle flood risk by making space for water and strategic policies SP 10.2, 10.3, 10.4, 10.54 on flood risk. We welcome the Plan aim to apply a strong presumption against development proposals within flood plains, as set out in policies DM 46 The Control of Development in Flood Plains and the promotion of sustainable Drainage Systems through Policy DM 47: Surface Water Drainage and Sustainable Drainage Systems (SuDS).

Transportation and Connectivity

We welcome Strategic Objective 6: Improve accessibility, connectivity and ease of movement to, from and within our Borough and promote sustainable travel choices. We support the Council's presumption in favour of new transport schemes and other infrastructure related development (where this meets the requirements of Policy SP 3 and other relevant policies and provisions of the LDP) and the presumption against development that would prejudice the implementation of any new transport scheme identified in the Local Policies Plan or Transport Plans.

CONCLUSION

In relation to these cross boundary issues and in line with the tests of soundness, subject to clarification on mineral development on Lough Neagh and Lough Beg discussed above, we consider there to be no perceived conflict with Mid Ulster District Council's draft Plan Strategy.

Yours faithfully,



Sinead McEvoy

Principal Planning Officer - Head of Development Plan and Enforcement

On behalf of Dr. Chris Boomer, Planning Manager