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11<sup>th</sup> December 2019

## Re: Mid & East Antrim Borough Council Local Development Plan 2030, Draft Plan Strategy September 2019

### Introduction with main Recommendations

DAERA welcome the opportunity to comment on the Mid & East Antrim Borough Council Local Development Plan 2030, Draft Plan Strategy. DAERA is of the opinion that the Plan is in general conformity with Regional Policy SPPS in respect of Natural Heritage policies subject to a small number of changes to a few plan policies which DAERA would deem necessary for full conformity.

DAERA recommends that all the 'text' changes recommended in Draft Habitats Regulations Assessment Report of the Draft Plan Strategy, September 2019, pages 16 – 20, must be accepted in full for the Draft Plan to achieve conformity and meet the legal requirements of the Conservation (Natural Habitats, etc.) Regulations (NI) 1995 (as amended).

DAERA is of the opinion that Policy MIN 7 is unsound in respect of Consistency Test C3 which requires the Council to take account of policy and guidance issued by the Department. However, a minimal change in text, as follows, would ensure that Policy MIN 7 is sound: add the wording "where the hydrology can be repaired and where, with appropriate rehabilitation management, there is a reasonable expectation of re-establishing vegetation with peat forming capability within 30 years" into the Justification and Amplification text to clarify what is meant by the exception "where the peat land is not reasonably capable of restoration". Alternatively, completely remove the exception "where the peat land is not reasonably capable of restoration".

DAERA would strongly advise that Policy Box SGS5, 'Management of Housing Supply' should clearly require that there is reference to 'phasing of housing' to correlate with sufficient WWTW infrastructure capacity availability to meet any projected discharge.



### **Additional Points**

Additional points are as follows:

#### **Section 2.1 Regional Policy Context**

Para 2.1.18: This should include The Northern Ireland Regional Landscape Character Assessment (NIRLCA) 2016. The NIRLCA is cited in the Council's Landscape Character Assessment but not in this section.

#### **Section 4.2 Strategic Objectives: Environmental objectives, most Related SPPS Core Planning Principles:**

On page 46, Principle (b): Although it is important that the high quality landscapes are protected, conserved and where possible enhanced it is also important that all landscapes are given the appropriate consideration within the Council area. This is in line with the European Landscape Convention (ELC) which was signed by the UK government in 2006 and introduced in March 2007. The ELC is the first international treaty dedicated to the protection, management and planning of all landscapes in Europe.

The guiding principle of the ELC is that all landscapes matter. As the European Landscape Convention acknowledges, "the landscape is an important part of the quality of life for people everywhere: in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas." We would for the above reasons recommend an additional principle is added that recognises the importance of all landscapes and the contribution they play within the Borough.

#### **Section 5.0 Spatial Growth Strategy and Countryside Strategy SGS5 Management of Housing Supply**

Development should not create or exacerbate environmental pollution or damage. Water Framework Directive (WFD) Objectives for waterbodies in the plan area are currently not being met.

The identification of further development land/housing should therefore also acknowledge the need for adequate wastewater treatment infrastructure and treatment capability. Given that such infrastructure in the Plan area is already under pressure combined with WFD Objectives not currently being met for a number of waterbodies in the LDP area, any further development/housing before infrastructure has been put in place or upgraded will exacerbate the difficulties in achieving the WFD Objectives.

The zoning of land and the timing of the release of that land for development should be aligned with the availability of suitable waste water networks and treatment infrastructure to service the developments to ensure there is adequate protection for the water environment.



The draft Habitats Regulation Assessment has screened out housing from the possibility of having Likely Significant Effects. It cannot however, be assumed that the 'quality checks' imposed on a discharge from housing development to ensure a certain water quality meet the same test for the satisfaction of the integrity of a European site. Additionally, the Housing Allocation Zoning for settlements on page 62, creates a certain presumption that houses will be built within settlements where currently there may not be sufficient wastewater infrastructure capacity. Notwithstanding an onus on government licensing authorities to ensure a standard of discharge, DAERA would strongly advise that Policy Box SGS5, 'Management of Housing Supply' should clearly require that there is reference to 'phasing of housing' to correlate with sufficient WWTW infrastructure capacity availability to meet any projected discharge.

### **SGS6 Strategic Allocation of Land for Economic Development**

In respect of SGS6 Strategic Allocation of Land for Economic Development, 'Measures to reduce negative effects and promote positive effects' are noted at 3.2.6 page 31 of the Sustainability Appraisal Report. These are not reproduced in the LDP in SGS6 or in any of the Policy Boxes ECD1-ECD4 inclusive.

### **Section 5.9 Countryside Strategy**

DAERA support in principle Policy CS2 Special Countryside Areas to protect the exceptional landscapes in the Borough. DAERA would suggest that it would give greater certainty/ clarity to Policy CS2 to include the sentence within paragraph 5.9.13 "Where development is permitted under this exception, adequate mitigation and/or compensatory measures must be agreed with the Council in advance of planning permission being granted" in the Policy Box.

DAERA notes that the Plan is designating a Special Countryside Area adjacent to the shores of Lough Beg. The SCA extends northwards along the River Bann and downstream, one field beyond Culnafay ASSI, however, the cross boundary SCA designation on the bordering Mid Ulster Council Draft Plan Strategy extends a further 5km downstream.

The Council should satisfy itself that there are no issues here with Consistency Test CE1 requiring Council policies and allocations to flow logically where cross boundary issues are relevant? Is there is arguably a mapping mismatch with the Mid Ulster LDP here?

DAERA would also suggest that the Justification and Amplification, paragraph 5.9.12: line 3 should be amended to: "To this end, Council may require the submission of additional assessments which fully demonstrate that the landscape value and character, heritage, ecology and biodiversity of the area has been fully considered and that any adverse impacts can be effectively mitigated."



Paragraph 5.9.16: line 1 should be amended to: "As these SCAs are of unique amenity value, it is important that they can be enjoyed by the public and tourists in a sustainable manner and in a way that does not diminish the quality of the resource itself or landscape character of the area."

### **Policy CS3 Areas of Constraint on High Structures**

DAERA would suggest the addition of the following paragraph:-

"All proposed High Structures within an ACHS will require an appropriate Landscape & Visual Impact Assessment (LVIA) commensurate with the height, nature and location of the proposal." The Council may wish to add this to the policy itself or include it within the 'Justification and Amplification' section.

### **CS5 Antrim Coast and Glens Areas of Outstanding Natural Beauty**

We would recommend that criteria (a) to:

"The nature, scale and location of the proposed use is compatible with the landscape and distinctive character of the AONB:"

DAERA recommend that criteria (f) should be expanded to clarify what is meant by the term "closely interlinked". This could be physically linked eg: along a river corridor or valley or visually linked eg: individual woodlands that are separate but read together in the landscape.

The Justification and Amplification: Para 5.9.35: line 5, states "Conservation, enhancement and subsequent management of important features within the AONB may be required in relation to some developments." Examples or an example should be given of such a feature for clarification.

### **CS6 Developed Coast (Belfast Lough Shore)**

DAERA would suggest the addition of the following under the aims section of the policy: "The delivery of educational benefit" (for example a nature trail or interpretive facility such as a bird hide or information panel).

### **CS7 Local Landscape Policy Areas**

DAERA would recommend that the term landscape character is used in the policy ie: "Development within Local Landscape Policy Areas will only be acceptable where it does not have a significant adverse impact on their intrinsic environmental value, landscape character, and landscape quality or amenity value"

### **CS8 Protection of Main River Corridors**

It should be made clearer in the policy itself (in relation to criteria (b) and (d)) that access may be restricted in places in the interests of biodiversity.

This is stated in the Justification and Amplification section: para 5.9.50 'Access and recreational routes' but this should also be included in the policy itself for clarity.

In the interests of consistency between the policy, which uses the term 'biodiversity' and the justification and amplification sections the term biodiversity should be used instead of 'ecology'.

### **Section 6.0 General Policy on All Development**

DAERA supports in principle General Policy GP1 and in particular (a)iv and (e)iv.

This Policy, however, does not appear to cover matters relating to land contamination, groundwater risks and risks to environmental receptors from developments. All developments should be developed in a 'suitable for use' capacity. Should risks from contaminated land potentially affect developments then certain risk assessments may need to be carried out and the site may need to be developed in conjunction with a remediation strategy. The Environmental Health Department within Mid & East Antrim Borough Council should be able to advise further with regards to development risks from land and/or groundwater contamination.

Criterion (a) point (i) should be amended to include the word 'landscape' as follows: "The development is compatible with....local distinctiveness and inherent character of the locality" should be amended to "The development is compatible with....local distinctiveness and inherent landscape character of the locality". The term landscape character is used universally in relation to the landscape profession and other professional bodies and includes both urban and rural land. DAERA are the custodians of the Northern Ireland Landscape Character Assessment and the NI Regional LCA and therefore recommend the use of the term. In addition the Council's Landscape Character Assessment forms a sound basis for the strategic proposals and uses the term throughout.

In the Justification and Amplification, paragraph 6.1.22 states that "Landscapes surrounding a settlement are important in maintaining a clear distinction between the urban entity and the countryside ...". DAERA would recommend that some clarity is given to this. If this means the urban-rural fringe, it may be a more understandable term to use.

### **Section 7.1 Economic Development**

The 'Measures to reduce negative effects and promote positive effects' identified on page 50 of the Sustainability Appraisal Report for Policy ECD 4 do not appear anywhere in the Policy Box in the LDP.

### **Section 7.3 Tourism**

Policy TOU1 Safeguarding of Tourism Assets

We would recommend the following amendment:-

"Planning permission will not be granted for development that would in itself or in combination with existing and approved development in the locality have an adverse impact on a tourism asset such as to significantly compromise its amenity, setting, landscape character and tourism value"



It is important to get the term landscape character into this policy as the Council's Landscape Character Assessment forms a sound basis for the strategic proposals.

In respect of Policies TOU2 – TOU8 inclusive, pressure for tourism development is often likely to coincide with national or international areas designated for their nature conservation value. It is essential therefore, that Policy TOU3 and the 'Justification & Amplification' are amended as recommended in the Draft Habitats Regulations Assessment Report of the Draft Plan Strategy, September 2019, page 17 in order to comply with the Conservation (Natural Habitats, etc.) Regulations (NI) 1995 (as amended). DAERA consider that reference to 'Environmental considerations' in SGS8 Tourism Strategy covers the protection of other natural heritage designations and interests.

### **Section 7.4 Minerals Development**

In respect of Policy MIN1, it is essential that the 'Policy' and the 'Justification & Amplification' are amended as recommended in the Draft Habitats Regulations Assessment Report of the Draft Plan Strategy, September 2019, page 18 in order to comply with the Conservation (Natural Habitats, etc.) Regulations (NI) 1995 (as amended).

DAERA would recommend the addition of the following interest to the proposed six interests ie: (a) to (f) :-

- The indigenous landscape character.

It is essential that any mineral development should be in-keeping with the indigenous landscape character – this is different to 'Landscape quality and visual amenity' in that it is the appropriateness of the location which is key and not the quality of the landscape.

Consideration should be given to referencing groundwater and water quality potential impacts from mineral developments.

In respect of Policy MIN2 Valuable Minerals, the wording states that there "will not be a presumption against the exploitation of valuable minerals .... in any area, apart from within designated Special Countryside Areas". This would then imply that there is not a presumption against the exploitation of valuable minerals within designated European sites and although the Policy then goes on to say that all proposals "must meet the General Policy and accord with other provisions of the LDP", which would include NAT1, it is erroneous and contrary to legislation to state that there is a presumption for development within a European site. The wording of the Policy must be changed to reflect this and to meet the requirements of Conservation (Natural Habitats, etc.) Regulations (NI) 1995 (as amended).

### Policy MIN 7 Peat Extraction

DAERA welcomes Policy MIN 7 in principle, with the decision of Mid & East Antrim to have a presumption against commercial peat extraction. However, DAERA still consider the policy to be unsound because it does not explain what is meant by the exception “where the peatland is already degraded and not reasonably capable of restoration”. This weakens the policy test by being open to interpretation and this is exacerbated by the wording in the justification and amplification at 7.4.36 where commercial extraction is limited to sites where the peatland is already degraded and not reasonably capable of restoration and where there is little conservation value. This statement is again open to interpretation and could be taken as being permissive of commercial extraction on inactive peat. However, just because an area of peatland is inactive, does not mean that it is not capable of restoration, nor that it has little or no conservation/scientific interest.

Peatlands are wetlands with a very high moisture content and this characteristic is fundamental to their maintenance and peat forming capabilities. However commercial peat extraction involves the installation of drains, which damages the hydrology and could have transboundary impacts on peatlands occurring across council boundaries.

The Interpretation Manual of European Habitats (European Commission DG Environment 1999) defines degraded raised bogs as those which are “capable of natural regeneration” ie “where the hydrology can be repaired and where, with appropriate rehabilitation management, there is a reasonable expectation of re-establishing vegetation with peat forming capability within 30 years”. This definition relates to raised bogs, but given that blanket bog complexes can encompass raised bogs, this definition could be reasonably extended to include blanket bog also.

Changes considered necessary to make sound:

- Add the wording “where the hydrology can be repaired and where, with appropriate rehabilitation management, there is a reasonable expectation of re-establishing vegetation with peat forming capability within 30 years” into the justification and amplification text to clarify what is meant by the exception “where the peat land is not reasonably capable of restoration”.
- Alternatively, completely remove the exception “where the peat land is not reasonably capable of restoration”.

### Section 9.2 Flood Risk and Drainage

This section does not specifically reflect flood risk potential from groundwater.

### Section 9.3: Renewable Energy, Policy RE1 Renewable Energy Development

Ground Mounted Solar Photovoltaic Installations:-

This states: “Large scale solar farms will not be permitted within the Antrim Coast and Glens AONB or Areas of Constraint on High Structures designated in the



LDP." We would recommend that large scale should be defined in order to avoid confusion and challenges from applicants/agents and other interested parties.

### **Section 9.5 Water and Wastewater**

DAERA welcomes the policy position FRD4 Sustainable Drainage (SuDS).

DAERA welcomes the policy position FRD5 Artificial modification of Watercourses

### **Section 9.6 Waste Management**

The waste policies, WMT1 to WMT5, appear reasonable and are similar to policies other councils have adopted. These are relatively high level policies and there is no specific information on waste facilities or locations.

### **Contaminated Land**

It is concerning that there is no specific policy relating to contaminated land in the draft Development Plan. Significant consideration should be given by the council to include a specific policy in relation to contaminated land reflecting both risks to human health and environmental receptors. Some of the other council draft development plans presented to DAERA have included specific standalone policies relating to contaminated land. Should Part III of the Waste and Contaminate Land Order (Northern Ireland) 1997 become enacted then this will place added responsibilities on local councils. The Local Councils will be the primary regulators for the regime and initial activity will focus on the preparation of site inspection strategies which are to be completed within 12 months of the regime being in place.

### **Section 11.0 Safeguarding our Natural Heritage**

DAERA supports in principle Policies NAT 1 – NAT 5 inclusive, however, notes the absence of a policy for Sites of Local Nature Conservation Importance.

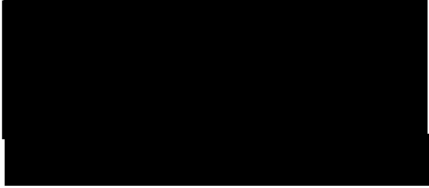
Page 301, Policy NAT4. The Justification and Amplification at 11.1.13 incorrectly implies that Ulster Wildlife could establish a LNR. Please note that the power to declare Local Nature Reserves (LNR) lies solely with District Councils under the Nature Conservation and Amenity Lands (NI) Order 1985 (as amended), however, the sites may actually be owned or managed by other bodies such as Ulster Wildlife, Woodland Trust, etc.

Glossary- the definition of contaminated land as per Part III of the Waste and Contaminated Land Order (Northern Ireland) 1997 should be provided.





Yours sincerely



Senior Scientific Officer  
NIEA, DAERA



## Appendix 1

### Issues concerning the Marine

#### Mid and East Antrim Local Development Plan – Draft Plan Strategy

The Marine Plan Team welcomes the opportunity to comment on the Mid and East Antrim Local Development Plan Draft Plan Strategy.

It is noted that our previous comments on Natural Heritage policy and Flood Risk Management policy have been addressed.

The LDP Draft Plan Strategy has had some regard to marine policy documents, although it appears to be selective on what policy areas and development proposals will impact on the marine area and consequently, when impacts on the marine area should be considered. In view of this the Council may be content that sufficient regard has been given to the UK Marine Policy Statement (MPS) and the draft Marine Plan for Northern Ireland to meet consistency test C4 for soundness.

However, there is scope to make the LDP Draft Plan Strategy more sound and advice is attached at Annex A. Annex A also includes comments on the draft Sustainability Appraisal.

The Council is reminded that in making decisions on planning applications which affect or might affect the whole or any part of the marine area, you (the council) is legislative required (under Section 8 of the Marine Act (Northern Ireland) 2013 and Section 58 of the Marine and Coastal Access Act 2009) to make decisions in accordance with the appropriate marine policy documents; unless relevant considerations indicate otherwise.

At present the UK Marine Policy Statement (MPS) is the appropriate marine policy document (the draft Marine Plan having limited weight at present) and is a material consideration in making decisions on planning applications. Should decisions not be made in accordance with the UK MPS in making its decision, the Council must state its reasons for not doing so.

The UK MPS promotes the integration of the marine planning system with the terrestrial planning system. It sets out the framework and high level principles (paragraph 2.3.2) for decision making and includes the environmental, economic and social issues for consideration, by decisions makers (such as the local council) when permitting development. The Statement can be viewed at <https://www.daera-ni.gov.uk/articles/marine-policy-%E2%80%93-uk-marine-policy-statement>

The Department has also produced a draft Marine Plan for Northern Ireland. This can be viewed at <https://www.daera-ni.gov.uk/articles/marine-plan-northern-ireland> The Plan builds upon the UK MPS and will come into effect when it is



published in final form. In the meantime, decisions are determined in accordance with the UK MPS.

#### Annex A

The following comments draw attention to weaknesses and provide advice on how your LDP Draft Plan Strategy could be made more sound by increasing the level of regard to marine planning documents and marine legislation. Advice is also provided on the draft Sustainability Appraisal Report. In taking on this advice the integration between terrestrial and marine planning systems will be strengthened.

### Draft Plan Strategy

#### Introduction and Setting the Context

It is noted that in the Initial Plan Preparation stage there has been no consideration of marine policy documents within the policy review, nor any engagement with DAERA as the Marine Plan Authority despite the marine area adjoining the Council area.

Whilst there is reference to marine policy documents in chapter 2, you are advised that regard to the UK MPS and engagement with DAERA should have been undertaken at the Initial Plan Preparation stage, given your legislative obligations under marine legislation and the UK MPS's equivalent standing to terrestrial planning policy documents, such as the Regional Development Strategy and Strategic Policy Statement.

Nonetheless, it would be helpful in section 1.7.1 to set out the marine legislative requirements with respect to the determination of planning applications that affect or might affect the marine area, as outlined above. As it currently stands the information contained in this section is misleading as your LDP is not the only policy document that planning applications must be in accordance with. This message may need to be reiterated in other sections of the document. For example, CS2 and section 5.10.4 refers to the UK MPS and the draft Marine Plan, and it is advised these sections, and others, should state that proposals must be made in accordance with the appropriate marine policy documents.

#### District Profile, Vision and Objectives

There is an opportunity to emphasize the Council areas linkages (watercourses etc) and boundary with the marine area at the outset of the District Profile chapter.

It would also be beneficial if the Strategic Objectives demonstrated their linkages with marine policy documents in the same way terrestrial planning documents have been considered and/or a specific objective for the marine area is included.

**Spatial Growth Strategy and Spatial Countryside Strategy**  
It is unclear whether the impacts on the marine area were considered as part of the spatial growth strategy. It is essential that spatial zoning at the local planning policies stage considers any impact or potential for impact on the marine area. There are numerous references to the SPPS. It is advised that specific details within the UK MPS (and draft Marine Plan) could also be drawn out across common policy areas within the various strategies in this chapter. For example, recreation is included in the UK MPS yet there is no reference to this or outdoor coastal recreation facilities within the Open Space Strategy. In addition, it would



be helpful to include a reference to the importance of the Port of Larne within the Transport Strategy; give explicit reference to seascape, where relevant, within the Countryside Strategy alongside landscape references and include consideration of impact on marine, coastal and transitional waters alongside river pollution and impact on water quality.

Whilst reference is made to the draft Marine Plan in the Tourism Strategy, it would be more appropriate to include a reference to the UK MPS, as the current marine policy document.

The Open Space Strategy refers to blue and green infrastructure and it is advised that specific mention is made to the marine area within the explanation of blue infrastructure.

Within the Countryside Strategy reference is made to sailing and angling. It is important to note that these activities are also facilitated in urban areas, such as Carrickfergus.

### Policies

Reference to UK MPS (and draft Marine Plan)

To improve integration, a key component of the UK Marine Policy Statement, between the planning systems and to ensure marine legislative requirements are met in the LPD Draft Plan Strategy you are strongly advised to include appropriate reference to the UK MPS (and draft Marine Plan), particularly where the RDS and SPPS are mentioned. This is important as these marine policy documents set out common considerations for the protection of the historic environment, natural heritage, flood risk and many other environmental, social and economic considerations. The UK MPS also sets out policy objectives for common policy areas such as surface water management and waste water treatment and disposal and tourism and recreation. For example, reference should be made to the UK MPS (as the current marine policy document) within paragraph 6.1.2, as the high level principles of decision making in marine planning also need to filter through to development on the ground via the operation of development management.

Impacts and Assessment of proposals against marine policy documents

The draft Plan Strategy includes broad policy criteria that often refers to:

- Impact/adverse/unacceptable impact on the environment, water quality, landscape, nearby activities or adjoining areas
- Pollution of or risk to water, watercourses
- Without harming the environment
- Improvement to the environment, water quality

It needs to be clear that these impacts, include those in the marine area, its uses, activities and environment and are not solely restricted to impacts on land. For example, impacts on water quality could include impacts on marine, transitional and coastal waters; and impacts on landscape could include seascape (see further comments below).

As it stands many of the policy areas appear to ignore the consideration of impacts on the marine area, its activities, uses and environment. For example, in the Tourism policy area impacts on the marine area are not explicitly drawn out



despite a number of Tourism Opportunity Zones having coastal locations. In addition, the criteria outlined in Policy OSL 5 on Development of Facilities Ancillary to Water Sports should also apply to the development of these facilities at coastal locations, as well as those located inland. Policy RE 1 could include criteria that does not restrict access to the coast, as well as the countryside and FRD 5 could include consideration of impacts on marine ecology and species, such as salmon.

It is noted that many of the policies contained within the Draft Plan Strategy require development proposals to "meet the General Policy". To ensure consideration of marine policy documents in decision making processes, it is strongly recommended that the General Policy makes provision to ensure development is also in accordance with the UK MPS and the Marine Plan for Northern Ireland (once adopted). Many development proposals have the potential to impact the marine area through a number of pathways and it is essential that these are considered. This will ensure impacts on the marine area, its activities, uses and environment are considered as part of the development management decision making process; and will assist in ensuring the Council meet its legal requirements under marine legislation.

#### Seascape (landscape)

There are many references to landscape and a number of references to seascape throughout the document and this is welcomed. However, it is advised that seascape is important in the urban setting, not just the countryside. It is also unclear if the references to landscape (protection, quality, character, integration etc.) and impacts upon it include seascape. It is advised that explicit reference to seascape should be used, where relevant, throughout the document and particularly within the various policies and amplifications where a coastal element is acknowledged or exists. For example, it is unclear whether or not the consideration of seascape quality and character is included in Policy CS2, especially since there are two coastal Special Countryside Areas. Seascape should also be considered within Landscape Impact Assessments. This will help ensure seascape will be considered within the decision making process, as required under the UK MPS and marine legislation. Reference is also made to the landscape character assessment in the technical supplement and again it would be helpful to specify if this character assessment includes a seascape aspect.

#### Guidance

The Planning Advisory Service has produced a 'Soundness Self-Assessment Checklist' that was updated in March 2014 to include marine planning. The checklist can be viewed at: <https://www.local.gov.uk/pas/pas-topics/local-plans/local-plan-checklist>. This document sets out the interactions between terrestrial and marine planning, including the requirements of the UK MPS for English based planning authorities. You are advised to use this checklist as a basis for ensuring soundness for your LPD Draft Plan Strategy with respect to the Northern Ireland marine area.



In addition, the Celtic Seas partnership produced guidelines to assist planning authorities to improve integration with the marine planning system by promoting 'Good Environmental Status' of the sea. This can be viewed at: <http://www.celticseaspartnership.eu/Celtic-seas-partnership/guidelines-planning-authorities/> The terrestrial planning system can play a key role in delivering on international obligations related to the marine environment.

## Appendix 2 Additional issues concerned with Landscape

### Section 5.6 Tourism Strategy, Para 5.6.7 Proposal/Policy Aims

DAERA would recommend that a bullet point should be added as follows:-

- To support the planning and implementation of appropriate infrastructure in relation to Mid and East Antrim's tourist assets.

The rationale behind this additional 'Proposal/Policy Aim' is that it goes wider than safeguarding assets or accommodating sustainable tourism in appropriate locations (which of course are important) – it is the capacity of the road network, the infrastructure of the villages, the routes to and from the tourist assets, car and coach parking, park and ride facilities and the spreading of the impact of tourism within the Council area which deserve appropriate planning.

### Section 5.8 Open Space Strategy, Policy SG Open Space Strategy

DAERA would suggest adding an element to elevate the link between the community and nature through the use of open space. We would suggest:-

- **Facilitating the link between the community and nature through existing and new areas of open space:** The LDP will support firm proposals for existing and proposed public open spaces which cater for the educational needs of children in particular and the community in general in relation to nature and wildlife.

### Section 5.9 Countryside Strategy

**Para 5.92:** "Landscape and seascape is often of high quality." should read "Landscape and seascape are often of high quality."

### Section 6 General Policy for all Development, Policy GP1 The General Policy for all Development

**General point:-**

The terms 'character' and 'setting' are used throughout the document. These are open to interpretation by all interested parties and can lead to confusion. It would be preferable to use the terms 'landscape character' and/or 'townscape



character' where possible when referring to 'character' as it would better focus the attention on the particular aspect eg:- townscape character in relation to streetscape within ATCs and landscape character in relation to development in a rural context. There may be occasions where townscape and landscape character overlap such as within Conservation Areas.



