



Comhairle Ceantair  
**Lár Uladh**  
**Mid Ulster**  
District Council

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Date: 4<sup>th</sup> December 2019

Dear Michael,

**Local Development Plan 2030: Draft Plan Strategy - Statutory Consultation.**

I write with reference to the above subject and further to your recent consultation in accordance with the requirements of 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. For our districts these are centred on Lough Beg and it's environmental designations. They include;

- Protection of environmental assets and designations;
- Management of Minerals Development;
- Sustainable tourism development (including Green / Blue Infrastructure) and;
- Flooding.

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

Whilst not an issue discussed at the Lough Neagh Forum Mid Ulster consider it necessary to make the following comments in relation to MEABC's spatial growth strategy.

Spatial Growth Strategy

The Draft Plan Strategy has laid out MEABC's position in relation to future growth as one which will focus primarily on growing the three largest settlements, Carrickfergus, Ballymena and Larne. There will also be opportunities for development in the towns of Cullybackey, Greenisland, Broughshane, Ahoghill and Whitehead through existing

committed development allocations in effort to consolidate their roles as key centres for housing, employment, facilities and services to support the rural population and its wider rural hinterland. Opportunity will be provided in villages to sustain, consolidate and revitalise their roles as local service centres to meet the daily needs of the rural area and accommodate rural businesses and appropriately scaled residential development.

We are supportive of this growth strategy and the policy aims as they are 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 MEABC and the sequential test which will be adopted for any out of town centre retail development which is in line with strategic policy.

### Lough Beg

The importance of Lough Beg (the Lough) is acknowledged through numerous international and national designations. The Lough is recognised within the DPS as a highly distinctive natural heritage asset. Lough Beg is both designated RAMSAR sites, an international designation aimed to halt the loss of wetlands. It is also a designated 'Area of Special Scientific Interest' (ASSI) and Special Protection Area (SPA).

The protection of this environmental asset and its associated designations, in the context of minerals development, sustainable tourism development (including Green / Blue Infrastructure) and flooding is discussed below.

### Protection of environmental assets and designations:

The DPS has identified and designated Special Countryside Areas (SCA's). These comprise the Borough's most exceptional landscapes recognised for their unique amenity value and the environmental assets associated with the natural and historic environment of these areas.

Within these SCAs there will be a presumption against all new developments given their sensitivity to change, other than a limited number of exceptions, which the DPS makes clear must also meet the General Policy criteria of the LDP. The DPS designates Lough Beg, including the shoreline, as a Special Countryside Area (SCA) and the precise boundary of the Lough Beg SCA has been defined within the accompanying district proposal maps. The boundary chosen for the SCA is broadly reflective of scope and scale of MUDC's own SCA at Lough Beg.

This designation and strategic policy is supported by detailed development management policies 'NAT1 – European and Ramsar Sites – International' and NAT 3 – 'Sites of Nature Conservation Importance – National'. These policies have been designed to afford protection to areas with International, National and Local designations.

It is noted that MEABC's proposed SCA does not extend as far northwards as MUDC's SCA along the River Bann. Mid Ulster's SCA encompasses Lough Beg and its

shoreline but it also extends further northwards along the western river bank of the River Bann, until it terminates just south of Glenone village. It is noted that MEABC's SCA terminates at the shores of Lough Beg however it is also recognised that the eastern shore of the River Bann falls within an 'Area of Constraint on High Structures' designation. This designation and associated Policy CS3 seek to control the scale of development relating to wind turbines, electricity pylons or telecommunications masts and sets differing criteria for varying heights.

We welcome the designation of Lough Beg as a 'Special Countryside Area' and we are supportive of the associated policies which demonstrate a commitment to uphold the protection of environmental assets and designations including, Lough Beg and it's shoreline. This accords with MUDC's approach and will ensure a consistent approach to all development proposals around the entire shore of Lough Beg.

### Management of Minerals Development

We note MEABC's strategic approach to minerals is to secure a balanced and sustainable approach to minerals development that takes account of the need for minerals to support development and provide employment and the need to protect landscape quality and other environmental assets. The strategic approach also makes it clear that it will seek to minimise the impacts of minerals development on landscape quality, natural and historic environment – particularly in areas designated for their importance in regard to one or more of these qualities.

We welcome the additional protection afforded to Lough Beg through SCA designation and the associated policies and consider there is no perceived conflict in relation to MUDC's Special Countryside Area (SCA) designations. Mid Ulster District have adopted a similar approach by designating SCA's around the shores of Lough Beg (and 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.

### Sustainable tourism development:

We note Strategic Objective d) which seeks to facilitate opportunities for sustainable development and safeguard key tourism assets from inappropriate development. The DPS acknowledges that tourism development is important to the local and regional economy and that the Council's tourism product has not been fully realised to date and therefore a balance is sought between protecting it's most sensitive environmental assets and accommodating sustainable tourism development.

We note that the DPS provides broad direction on the potential opportunities and constraints for tourism and that it sets out three categories of tourism potential. Lough Beg has been designated as an SCA and it is therefore considered vulnerable to tourism development in recognition of the quality its landscape and significant conservation interests. Importantly, the DPS recognises that little or no tourism development should be permitted within the majority of its extent.

We note MEABC's decision to designate Tourism Opportunity Zones throughout the district. Within TOZs the plan requires tourism development to be sustainable,

environmentally sensitive and of high quality design and this approach accords with the approach adopted by MUDC.

## 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 f): To avoid new development in areas known to be at significant risk from flooding and take account of increased vulnerability associated with climate change. We also support the strategic policies CS6 and CS8 on flood risk and we also welcome the aim of policies GP1 and FRD1, all of which apply a strong presumption against development proposals.

We welcome MEABC's approach to Sustainable Drainage Systems (SuDS) through Policy FRD4: Sustainable Drainage (SuDS) which requires a sustainable drainage solution for management of surface water run-off for any development that triggers the requirement for a Drainage Assessment under policy FRD3, unless it can be demonstrated that the site is unsuitable for a SuDS solution. Policy FRD4 also makes it clear that SuDS solutions may also be required for particular zonings (housing and economic) identified in the Local Policies Plan. MUDC welcome this approach to SuDs development as it will only strengthen the regions resilience to climate change.

## **CONCLUSION**

In relation to these cross boundary issues and in line with the tests of soundness, we consider there to be no perceived conflict with Mid Ulster District Council's draft Plan Strategy.

Yours sincerely,

A black rectangular redaction box covering the signature of Michael McGibbon.

**Michael McGibbon**  
**Senior Planning Officer**

**On behalf of Dr Chris Boomer, Planning Manager**