



## **Lisburn and Castlereagh City Council - Local Development Plan – Draft Plan Strategy – Focused Changes Addendum including Minor Changes Schedule – January 2021**

*A response from RSPB Northern Ireland, 12 March 2021*

### **Introduction**

The RSPB is UK's lead organisation in the BirdLife International network of conservation bodies. The RSPB is Europe's largest voluntary nature conservation organisation with a membership over 1 million, supported by over 11,000 of which live in Northern Ireland. Staff in Northern Ireland work on a wide range of issues, from education and public awareness to agriculture and land use planning.

We believe that sustainability should be at the heart of decision-making. The RSPB's policy and advocacy work covers a wide range of issues including planning and regional policy, climate change, energy, marine issues, water, trade and agriculture. As well as commenting on national planning policy issues. The RSPB's professional conservation and planning specialists engage with over 1,000 cases each year throughout the UK, including development plans and individual planning applications and proposals. We thus have considerable planning experience. The RSPB also makes over 100 planning applications a year on its own reserves and estate.

The RSPB firmly believes that planning, especially plan-making should seek to integrate the three pillars of sustainable development rather than balancing, as this could potentially result in environmental trade-offs.

No plan, programme or project should result in a significant direct impact upon important birds or bird habitats. The full suite of Environmental Assessments (SEA, EIA, HRA) should be used as tools to minimise environmental impacts. The Government and planning authorities should ensure that full

protection is afforded to both designated and non-designated sites important for wildlife and biodiversity.

RSPB NI welcomes the opportunity to comment on the Lisburn and Castlereagh City Council (LCCC) Local Development Plan (LDP) draft Plan Strategy (dPS) – Focused Changes Addendum including Minor Changes Schedule – January 2021

Please note that not all changes have been commented on. The numbering and sequencing of RSPB NI comments below follows that contained within consultation document (January 2021).

### Response 1

#### Focused Change FC14B

FC14B	UT1 Utilities	<p>The Council proposes for clarity, as a <u>focussed</u> change, to amend Policy UT1, page 104, as follows:</p> <p><i>"To ensure that the visual and environmental impact of utility development is kept to a minimum, the provision of utility services such as water, wastewater, electricity and gas to new development proposals should be laid underground where considered feasible and viable.</i></p> <p><i>An exception will be permitted for overhead electricity lines and poles serving new development, where underground provision is not feasible or viable.</i></p>	In response to representation from NIE Networks (DPS-096) concerning clarity of the policy wording	Does not impact upon the soundness of the Plan – whilst this is a <u>focussed</u> change to policy, it is considered necessary for clarification
-------	---------------	--	--	--

		<p><i>Proposals for all overhead electricity lines and associated infrastructure, either regional transmission or local distribution networks, will be subject to the following:</i></p> <ul style="list-style-type: none"> <li><i>a) pylons, poles and overhead lines should follow natural features of the environment, having regard to <u>designated</u> areas of landscape or townscape sensitivity, to <u>minimise</u> visual intrusion;</i></li> <li><i>b) Avoidance of areas of nature conservation, historic environment or archaeological interest, <u>where possible</u>;</i></li> <li><i>c) <u>Wirescape</u> should be kept to a minimum;</i></li> <li><i>d) Associated infrastructure works should be visually integrated, making use of existing and proposed landscaping;</i></li> </ul> <p><i>(e) Proposed power lines should comply with the 1998 International Commission on Non-Ionizing Radiation Protection (ICNIRP)."</i></p>		
--	--	---	--	--

With reference to the proposed change at part b), RSPB NI considers this to be a weakening of the existing strategic policy provision of ‘should avoid’ as contained within paragraph 6.250 of the SPPS, which states:

‘6.250) ‘...Furthermore, such proposals will be considered having regard to potential impact on amenity and **should avoid** areas of landscape sensitivity, including Areas of Outstanding Natural Beauty (AONBs)’ (our emphasis).

## Response 2

### Minor Change MC24C

MC24C	MD1 Environmental Protection	<p><i>The need to protect and conserve the environment.</i></p> <p>The Council proposes for clarity, as a minor change, to amend Policy MD1, page 51, by removing the second paragraph of the J&amp;A and placing it in the Policy (last paragraph) as follows:  <i>“Permission for the extraction of peat for sale will only be granted where the proposals are consistent with the protection of boglands valuable to nature conservation interests, and with the protection of landscape quality particularly in AONBs.”</i></p>	In response to representation from DfI (DPS-109) concerning aligning the policy with the SPPS	Does not impact upon the soundness of the Plan – whilst this is a change to policy it is considered a minor/factual correction for clarification only
-------	------------------------------	---	---	---

In light of the growing political consensus that we face a nature and climate emergency, it is considered that the proposed minor change does not go far enough in ending commercial peat extraction within the LCCC area and is inconsistent with policy being progressed in other council areas as part of their own draft Plan Strategy. Please refer to RSPB NI’s response to the draft Plan Strategy Consultation particularly Response 15 (pages 37-40), which specially relates to Policy MD1 Environmental Protection for further details and justification in this regard.

Given the critical role of peatland habitats delivering a wide range of benefits to society, including the storage of huge amounts of carbon, it is no longer appropriate to treat peatland habitats in a ‘business as usual’ manner.

The UK government has set an ambitious target to achieve net zero greenhouse gas emissions by 2050. To date, emissions have fallen much more slowly in NI compared to the UK as a whole; emissions fell by 9% from 2008-2016 in NI, compared to a 27% fall for the whole of the UK. The restoration of peatland is a key nature-based climate solution that should be prioritised in NI to help address the nature and climate emergency. The relevance of peatland protection and restoration to climate action is reflected

## Northern Ireland

in the UK CCC Reducing Emissions report: 'The future inclusion of emissions from degraded peatland in the UK emissions inventory could add around 9% to Northern Ireland's total emissions'.

### **For further information contact:**

Michelle Hill MRTPI

Head of Nature Policy and Casework

RSPB Northern Ireland

**E-mail:** [REDACTED]

**Telephone: 028 9049 1547**

ENDS.