

**COUNCIL FOR NATURE CONSERVATION
AND THE COUNTRYSIDE**
An Advisory Council to the Department of the Environment
4th Floor, Clarence Court, 10-18 Adelaide Street, Belfast, BT2 8GB
Tel: 02890 541071
secretariat-hillst@doeni.gov.uk
www.cncni.gov.uk

8 April 2011

**SPATIAL STRATEGIES ON THE ISLAND OF IRELAND –
Framework for Collaboration**

CNCC welcomes the opportunity to comment on this Consultation Document which examines the planning challenges faced by both parts of the island and considers the potential for collaboration in spatial planning.

We generally welcome the concept of collaboration in spatial planning between Northern Ireland and the Republic of Ireland, and see this as a logical extension of the existing arrangements for closer working between the two states as outlined in Paragraphs 1.15 to 1.20. Our concern would lie more in the weakness of the Spatial Strategies, the RDS in Northern Ireland, and the National Spatial Strategy in the Republic. The experience over the past ten years is that these have both failed to deliver the principle of sustainable development which they both claim to have at their core, but which has been widely (and possibly deliberately) confused with sustainable growth. The revised draft RDS perpetuates this confusion, with the two terms used as if they were interchangeable throughout the document. The results have been catastrophic for both the economies and environment of the island, and it is important that the lessons of the failure are not repeated in the future.

The following comments are concentrated on our area of expertise and experience, the environment.

ENVIRONMENT

Paragraph 3.22

It should be pointed out that the attractiveness of the island has the potential to deliver major economic benefits through tourism. It is essential that this attractiveness is not undermined by inappropriate development, and spatial strategies have a key role to play in setting out important principles for more detailed local plans.

Paragraph 3.23

We welcome the explicit recognition of our shared environment, and the example of the common river basins which require cross-border action in order to meet the targets of the Water Framework Directive. Rivers, lakes and mountains are not the only habitats we share however, and the omission of the marine environment is of great concern to us, at a moment when all of Europe is moving to implement the Marine Strategy Framework Directive, which will introduce the concepts of Marine Planning and Marine Protected Areas. These are areas that must be covered by spatial strategies and must also be closely co-ordinated with terrestrial planning, with

particular emphasis on the coastal environment. We believe that there should be reference to all these issues in this document.

Paragraph 3.24

We welcome this paragraph with its recognition of our shared responsibility to our biodiversity and the possibility of creating ecological networks. After habitat loss the greatest threat to biodiversity is seen as invasive species, and there are already good working arrangements between the two parts of the country for tackling this issue. Underlying all our biodiversity (and our landscape) is our geology, and we would have welcomed acknowledgement of the importance of geodiversity, with reference to the success of the cross-border Geopark in Fermanagh and Cavan, and the possibility of further similar initiatives.

Paragraph 3.25

We are pleased to see the recognition of the need to manage landscape on a cross-border basis, but would have liked to see a reference to the European Landscape Convention to which both states are signatories.

The other important environmental attribute that the whole island of Ireland shares is Air Quality, which is not mentioned in this document. We believe that there should be some consideration given to this and how it might be improved.

CLIMATE CHANGE

CNCC is pleased that climate change is given prominent and appropriate attention in this document, but only mitigation of greenhouse gas emissions is discussed. There are many implications of climate change, from raised sea levels to increased risk of flooding and severe drought. Serious thought at a strategic level needs to be given to adaptation to these changes on an all-island basis.

One aspect of mitigation that should also be considered at a top level is that of Carbon Capture and Storage, which if all else fails could become increasingly important. Serious thought needs to be given to how this might be achieved, and the implications for the economy.

ENERGY

Paragraph 3.36

We welcome the recognition of the importance of marine-based renewables and particularly offshore grid developments. We are deeply concerned about the implications for our coastal environment if marine renewable energy development is not carefully planned on an all-island basis, with due regard to bringing the electricity on to land as well as placing the means of generation in the sea.

C. ENVIRONMENTAL QUALITY

We welcome this whole section, with its clear statements of the importance of our environment and the statutory requirements of various EU Directives. We would suggest that the Water Framework Directive and the Marine Strategy Framework Directive are mentioned here, with further reference to the shared responsibilities for marine and coastal environments. We are pleased to see the references to sustainability in Paragraph 4.12, which capture the true essence of sustainability, rather than confusing the issue.

D. SPATIAL ANALYSIS

We are pleased to see the commitment to an evidence-based approach to strategic planning as laid out in Paragraph 4.13. We also welcome the commitment to harmonising and integrating key datasets which should add enormously to their value.

LEVEL 2 – REGIONAL AND LOCAL AUTHORITIES

Paragraph 4.25

We welcome the clear recognition of the importance of continuing collaboration in the designation and protection of key environmental assets. A number of our most important designated sites in Northern Ireland such as Slieve Beagh (SPA, SAC and Ramsar Site), Pettigoe Plateau (SPA, SAC and Ramsar Site), Lough Foyle and Carlingford Lough (SPAs and Ramsar Sites) are contiguous with similarly designated sites on the southern side of the border. A consistent joint approach to protection and management is essential for these sites. In other cases, such as Magheraveely Loughs (SAC and Ramsar Site) the designation is on only one side of the border, but the site is vulnerable to inappropriate development on both sides, and this needs to be considered in drawing up development plans and considering planning applications by local authorities.

We hope that this collaboration will extend to Marine Protected Areas as well as terrestrial sites, and suggest that these should be included in this paragraph.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Patrick Casement', written in a cursive style.

Patrick Casement
Chairman