

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

30 March 2011

Louise Fitzpatrick,
Regional Planning and Transportation Division,
3rd Floor,
Clarence Court,
10-18 Adelaide Street,
BELFAST
BT2 8GB

Via email

DRAFT HABITATS REGULATIONS ASSESSMENT OF THE RDS

CNCC welcomes the opportunity to comment on this assessment which accompanied the draft RDS 'Shaping our Future'. In our comments to that document we have included several references to this one, particularly where we felt that recommendations made here were not included in the RDS. We have suggested that all recommendations should be included, since this assessment refers to impacts on sites that are part of the E2K network of internationally protected areas, and failure to protect them will leave Northern Ireland open to infraction proceedings from the European Commission, with the potential for substantial fines.

We have been impressed by this Assessment, which is detailed, thorough, comprehensive and careful in its approach to the potential impacts of the RDS. It sets out the full suite of sites in Northern Ireland and also those outside the province that might conceivably be affected by activities here, and considers how these might be affected by the proposals in the RDS. This task was not easy, given the diffuse and often vague nature of many of the proposals, and a great deal of effort has been put into trying to understand the possible impacts.

The data gathered here is potentially of enormous benefit to a wide range of public bodies involved in the delivery of the RDS over the coming years. We recommend that it is made available to all local authorities to assist in the preparation of new local plans, where it will be invaluable. It is also critical that ongoing assessment of the implementation and progress of the RDS takes this document and its findings into account if damage to European and international nature conservation sites is to be avoided.

Yours sincerely



Patrick Casement
Chairman