## Appendix 1: Draft Council Response to DAERA on Draft Marine Plan for NI

## Planning & Place

Your reference P/FP/LDP/52

Our reference 245189

Date

Mr Colin Armstrong Marine Plan Team Marine and Fisheries Division Klondyke Building Cromac Avenue Malone Lower Belfast BT7 2JA

Dear Mr Armstrong,

#### Consultation on the proposed Marine Plan for Northern Ireland

I refer to your letter dated 18<sup>th</sup> April 2018 in relation to the public consultation on the draft Marine Plan for NI and thank you for affording the City Council the opportunity to comment on the documents. I can confirm that the City Council has considered the consultation documents and wishes to make the following comments at this time.

The draft Marine Plan generally represents a positive and proactive approach to the sustainable development and management of the marine resource. This is of significance to Belfast as a long-established port city and the regional capital and economic driver. This balanced approach is welcomed and is consistent with the City Council's approach to our own sustainable growth.

The council considers it appropriate that any decision-making takes account of potential impacts on the marine resource, including decisions about terrestrial plans and projects given this resource's importance to the city as it includes part of Belfast Harbour and the lower River Lagan.

The draft Plan's general presumption in favour of sustainable development of the NI marine resource, adopting a balanced approach between the interests of the economy, people and the environment is consistent with current national and local planning policy and remains consistent with the Council's aims and objectives, including those in the Belfast Agenda and the emerging LDP.

There are not considered to be any significant negative implications for the City Council arising from the Draft Marine Plan for Belfast and, indeed, its overall aim to secure the long-term sustainable management and development of the marine resource, including socio-economic and environmental benefits, are supported.

In addition to the above comments, please also find attached a response to the online survey questionnaire that you used to facilitate public consultation. Whilst some of the specific questions are of limited relevance to Belfast City Council and the Council's operational area, responses have been given to as many of the questions as possible.

I trust that the above comments and the attached questionnaire responses are helpful and will be taken into account when finalising the Marine Plan documents. Should you require any further

clarification, please contact Mark Whittaker, Development Planning & Policy Team, Planning & Place, Tel: 02890 320202 ext. 2321.

Yours sincerely

Director of Planning and Place

### Draft Marine Plan for NI – Online Consultation Questionnaire Belfast City Council Responses to Consultation Questions

## Are you content with the Marine Plan vision and objectives?

Yes

BCC agrees with the draft Marine Plan and its vision and 8 objectives. The general approach is in line with the Belfast Agenda, current planning policy and our emerging LDP policy approach. Similarly, the draft Plan gives due recognition and balance to the three pillars of sustainability.

# Does the section on 'Using this Marine Plan' explain how the Marine Plan should be used in decision making?

Yes

The section explains how the Plan should be used by all relevant authorities and stakeholders.

# **Do you agree with the approach that is taken on Stakeholder Engagement?** Yes

BCC agrees that proposers should undertake appropriate and proportionate prior consultation on proposals – this is similar to normal procedures for major planning applications.

## Do you agree with the approach that is taken on Air Quality?

Yes

This is in line with current planning/environmental protection policy and our emerging LDP policy approach, including our Air Quality Management Plan.

# Do you agree with the approach that is taken on Climate Change Mitigation? $\ensuremath{\mathsf{Yes}}$

This is in line with current planning/environmental policies and our emerging LDP policy approach.

#### **Do you agree with the approach that is taken on Climate Change Adaptation?** Yes

This is in line with current planning/environmental policies and our emerging LDP policy approach.

## Do you agree with the approach that is taken on Coastal Processes?

Yes

This is generally in line with current planning policies and our emerging LDP policy approach. BCC has full regard to flood risk and hazard maps and the advice of DfI Rivers.

### **Do you agree with the approach that is taken on Resilience to Coastal Processes?** As above

## Do you agree with the approach that is taken on Co-Existence?

Yes

It is fully accepted that one activity or development should not prejudice another legal and appropriate use and this is a long-standing planning principle.

# **Do you agree with the approach that is taken on Cumulative Impacts?** Yes

The council gives consideration to cumulative impacts through the Development Management or EIA process and the SEA process.

# **Do you agree with the approach that is taken on Designated Heritage Assets?** Yes

This is in line with current planning policies and our emerging LDP policy approach.

# **Do you agree with the approach that is taken on Undesignated Heritage Assets?** Yes

This is in line with current planning policies and our emerging LDP policy approach.

# Do you agree with the approach that is taken on Invasive Alien Species? $\ensuremath{\mathsf{Yes}}$

This is in line with current planning/environmental policies and our emerging LDP policy approach.

Also in line with the Invasive Alien Species Strategy and EU Maritime Spatial Planning Directive.

### **Do you agree with the approach that is taken on Land and Sea Interaction?** Yes

This is in line with current planning/environmental policies and our emerging LDP policy approach.

## Do you agree with the approach that is taken on Marine Litter?

Yes

This is in line with current planning/environmental policies and our emerging LDP policy approach.

## Do you agree with the approach that is taken on Marine Noise?

Yes

This is in line with current planning/environmental policies and our emerging LDP policy approach, including environmental protection policies.

# Do you agree with the approach that is taken on International and National Designated Sites and Protected Species?

Yes

This is in line with current planning/environmental policies and our emerging LDP policy approach, including natural heritage and biodiversity policy.

# Do you agree with the approach that is taken on Other Habitats, Species or Features of Importance?

Yes

This is in line with current planning/environmental policies and our emerging LDP policy approach, including natural heritage and biodiversity policy.

## Do you agree with the approach that is taken on Seascape?

Yes

This is in line with current planning/environmental policies and our emerging LDP policy approach, including landscape protection policy.

#### Do you agree with the approach that is taken on Use of Evidence? Yes

The use of the best evidence available at the time is an essential basis for good decisionmaking.

## Do you agree with the approach that is taken on Water Quality?

Yes

This is in line with current planning/environmental policies, the River Basin Management Plans and our emerging LDP policy approach, including water guality and environmental protection policy.

### Do you have any general comments on the Core Policies? No

## Do you agree with the approach that is taken on Aquaculture?

Yes

BCC generally supports the presumption in favour of development, provided there is no significant adverse impact on the marine environment and other appropriate marine uses.

### Do you agree with the approach that is taken on Carbon Capture and Storage? No comments

### Do you agree with the approach that is taken on Commercial Fishing? No comments

### Do you agree with the approach that is taken on Defence and National Security? No comments

## Do you agree with the approach that is taken on Dredging?

Yes

BCC generally supports the presumption in favour of dredging, subject to consideration of potential adverse impact on the marine environment, as this is crucial to maintaining vital port operations.

# Do you agree with the approach that is taken on Energy?

No comments

## Do you agree with the approach that is taken on Marine Aggregates?

No comments

## Do you agree with the approach that is taken on Navigational Safety?

Yes

It is important to safeguard navigational safety as this is crucial to maintaining vital port operations.

## Do you agree with the approach that is taken on Shipping?

Yes

BCC generally supports the presumption in favour of shipping and port operations as this is crucial to maintaining the vital role that the port plays for Belfast's economy, people, culture and reputation.

### **Do you agree with the approach that is taken on Ports and Harbours?** As above

### **Do you agree with the approach that is taken on Telecommunications Cabling?** No comments

# **Do you agree with the approach that is taken on Tourism and Recreation?** Yes

BCC generally supports the presumption in favour of tourism and leisure developments as this is important for Belfast's economy, people and international reputation.

#### **Do you have any general comments on the Key Activity Policies?** No comments

Is the section on 'Monitoring and Review' easily understood? No comments

### Have you any suggestions on how the Marine Plan should be monitored? Yes

It is agreed that monitoring of the Plan should, as far as possible, draw on existing monitoring programmes and data.

## Do you have any comments on the Marine Plan Assessments?

No comments