



**Causeway
Coast & Glens
Borough Council**

Planning Department
Cloonavin
66 Portstewart Road
Coleraine
BT52 1EY

RSES Submissions
rses@nwra.ie

Date: 7th February 2019

Tel; 048 7034 7137

Dear Sir/Madam,

Re: Northern & Western Regional Assembly (NWRA): Draft Regional Spatial and Economic Strategy (RSES).

Thank you for your correspondence, received on 3rd December 2018, in relation to the above. I can advise that the consultation was presented at the 23rd January 2019 Planning Committee at which it was agreed that I would respond on behalf of the Council.

I wish to make the following comments on the Draft RSES and the accompanying SEA Environmental Report (ER), Natura Impact Statement (NIR) and Regional Flood Risk Assessment (RFRA).

Draft RSES

The Council acknowledges that the purpose of the RSES is to support the implementation of the National Planning Framework (NPF) and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region over a period of between 12 years and 20 years.

It is acknowledged that the RSES will integrate and align National Planning Policy with Local Economic & Community Plans and Local Development Plans and that the RSES will replace the Regional Planning Guidelines. It is also acknowledged that other local plans and strategies must be aligned with the RSES.

Donegal County Council (which lies within the NWRA) is an "adjoining council" for the purposes of the Council's Local Development Plan (LDP), having a common water body (Lough Foyle) and ferry crossing (Magilligan to Greencastle). There are a number of additional connections with the Borough including education, employment, travel and tourism.

Sections of this Borough lie within the North West City-Region, the Donegal-Derry NWRA Sub Regional Catchment Area and the North Western and Neagh Bann River Basin Districts.

There are some specific references to the Causeway Coast throughout the RSES:

Pg.99 - Developing trails based on wealth of natural and cultural heritage assets within the North West City Region; this includes links to the Wild Atlantic Way and the Causeway Coast.

Pg.289 (Co-ordination of investment in infrastructure) - Connectivity through the ferry, linking the Causeway Coast with North Donegal and the Wild Atlantic Way. The Hibernia Atlantic Group connects locations in the North-West, including Coleraine...through Project Kelvin.

Of particular relevance is section 3.6(B) at Pg 82 - Letterkenny Regional Growth Centre Strategic Plan: incorporating North West City Region MASP. Investing in Infrastructure (Policy 5.1): the western part of Causeway Coast and Glens Borough lies within the one hour drive zone of the North West Metropolitan Area.

The Council acknowledges the references to the Greencastle to Magilligan Ferry (Pg. 228: Ports & Harbours).

The Council requests that where all-island maps are used, that these reflect the up to date (11no.) Council boundaries in Northern Ireland.

SEA/Natura Impact Reports

The Council notes the Regional Policy Objective (Pg. 208 of Draft RSES) to "Conserve and protect designated areas and natural heritage area. Conserve and protect European Sites and their integrity" and that the SEA, NIR and RFRA are allied in terms of their baseline evidence.

SEA Report:

The Council notes the contents of the SEA Environmental Report and the reference to our common body water - Lough Foyle RAMSAR and SPA and Magilligan SAC. The inclusion of Lough Foyle within the geographic scope is welcomed, as is the cognisance of Northern Ireland Natural Heritage (strategies and legislation).

It is also noted that the Draft NI Marine Plan, State of the Environment Report for NI and its annual statistical update report (2018) are included for consideration and taken into account.

DAERA: NIEA comments (Pg 44) in relation to this must be fully explored and should be incorporated into the final RSES.

The relationship of the Draft RSES and other Plans, Programmes and Policies (in relation to the topics outlined) is noted.

Section 8.4: Cumulative Effects on Biodiversity Flora and Fauna and Water are noted. These must be fully explored and incorporated into the final RSES.

Section 8: Summary of Overall Strategy – The Council notes that in summary, the Draft RSES promotes a broad sustainability agenda, and that it is anticipated that

additional environmental protection measures will be identified and discussed in advance of the final strategy.

Section 9.0: Mitigation and Monitoring – Proposed SEA & AA mitigation measures (set out for each chapter of the draft RSES) and the RFRA Mitigation Strategy are noted and welcomed. The issues identified for monitoring are also noted.

NIR Report:

The consideration of up to date case law in both AA Screening and NIR preparation is noted and welcomed.

The Council notes that potential adverse impacts the RSES might have on the integrity of European sites, and in particular the “in combination” effects, have been assessed in the absence of any mitigation measures and taking account of the precautionary principle. A “source-pathways-receptor” approach has been applied to this assessment.

Section 4.1 Identification of European sites: The Draft RSES outlines some geographic specificity for the implementation of the RSES measures. However, other objectives apply to the region as a whole, therefore it must be assumed that these measures could be implemented anywhere within the NW Region. The Zone of Influence (Zoi) extends to European Sites outside of 15km, including, as relevant, European Sites within Northern Ireland to include ecological receptors connected to the draft RSES through overlap/intersection, proximity and connectivity through features such as watercourses and groundwater interactions (Figures 4-2 & 4-3 refer).

Section 5: AA Scoping/Screening (May 2018) - The Council notes that DAERA (NIEA) was consulted at this stage (response included in Appendix 1 of the NIR). The potential for likely significant effects on a European site could not be ruled out, therefore a Stage 2 Assessment was required and a Natura Impact Report to inform it.

Section 6: AA Stage 2 Assessment – It is acknowledged that RSES is a regional strategy and as such, prediction of effects is raised within the confines of the RSES with a view to appropriately informing lower level planning, where the necessary spatial detail is available.

Table 6.2 of the NIR sets out the potential ecological effects associated with the policy objectives outlined in the draft RSES.

Section 7: Assessment of Effects off Draft RSES - The Council notes the contents of Table 7.1, which sets out the protective regional policy objectives relevant to European Sites and/or Natura 2000 Network, and Table 7.2 which details the “in-combination” impacts with other plans and strategies.

Section 8: Mitigation Measures/Recommendations (Overall Mitigation Strategy) of the NIR Report is also noted and welcomed. Whilst it is acknowledged that the

mitigation proposed is aligned with and has been drawn up in parallel with the SEA Environmental Report, what proposals are there to monitor mitigation measures and what are the actions to be taken where mitigation does not deliver the anticipated impact?

It is also noted that the overarching mitigation strategy is therefore that potential Likely Significant Effects or Adverse Effects on Site Integrity will be considered fully at project level during pre-planning design and AA.

Table 8.1 details how the mitigation measures/recommendations (for each of the RSES chapters) have been addressed in the draft RSES.

Climate Change/Flooding

The Council notes the contents of the Regional Flood Risk Assessment (RFRA).

The delivery of the Floods Directive is being coordinated with the requirements of the EU Water Framework Directive (WFD) (2000/60/EC), which aims to improve the overall quality of the water environment including rivers, groundwater and coastal waters. This process is being delivered through the development of River Basin Management Plans (RBMPs) to enable all rivers and coastal waters to achieve good ecological status.

The recently published Catchment Flood Risk Assessment and Management (CFRAM) Plans (for North Western (UOM01) and Neagh Bann (UOM06) River Basin Districts) are also of particular (coastal) relevance. These are noted and welcomed.

The Council acknowledges that the integration of the RFRA within the SEA is derived from the EU SEA Directive (2001/42/EC) legislation.

Collaboration

The Council continues to work collaboratively with planning authorities in both jurisdictions: - namely Derry City & Strabane District and Donegal County Council. All three attend the Cross Border Development Plan Working Group. This is set to continue as it is considered key to ensuring that key social, economic and environmental issues relevant to all three authorities are highlighted and discussed.

Yours sincerely,


Denise Dickson
Head of Planning