

Submission re the Strategic Assessment Paper (incorporating SEA)

From



Dear Sir/Madam,
please find below my submission re the SA report.

Typographical error regarding numbering of Monitoring Objectives.

There appears to be a typographical or proof reading error regarding the Monitoring Objectives. As an example in Section 6.0 Monitoring and implementation P41 looks at the SA Objective and cross references the monitoring indicator/objective in the Draft Plan Strategy (LDP) document in table 5:

However in SA the LDP Monitoring indicator for Minerals (Objective 21) is noted as objective 22 in the table. Also Tourism (20 in LDP section 7) is noted as 21 in SA document.

Whilst I have had confirmation that the error is fixed, it should be noted that it causes issues when cross-referencing the Objectives of the SA, the Objectives of the Strategic Plan, and the Monitoring Objectives.

Monitoring measures missing from SA Objectives table.

In SA objectives, P41-43, the Monitoring measure re"Extent of Mineral reserves and extracted Mineral assets" is included with regards to Objective 17 (Land Soil Quality) however it doesn't appear next to Water quality (objective 10) (Minerals extraction is by nature very hydro intensive) It needs to be added here as a measurement objective and the subsequent Table 7/8 of Plan updated. Indeed Para 4.75 Policy clarification talks extensively about water pollution. It seems incoherent that after identifying that Mineral exploration (Assessment) and Mineral production may cause issues with pollution of surface and ground water , that the monitoring indicator is missing from the SA Objectives. Indeed given in table14 assessment of Minerals development, Water quality is scored a negative, one would assume a linkage between the two to be coherent within the SA Objectives.

In SA objectives P41-43 the monitoring objective "Extent of Mineral Reserves and extracted Mineral assets" is included with regards to Objective 17(Land Soil Quality). However it doesn't appear next to Air Quality (Minerals extraction can cause localised heavy air pollution including but not limited to fugitive emissions eg Natural Gas exploration and production). It should be noted that CO2 is considered a pollutant (when CO2 emitted as a result of the burning of fossil fuels) and also that Methane is a potent greenhouse gas with a 20 Year lifetime multiplier of 84 times that of CO2 (ie 1 tonne of Methane over a twenty year period would contribute to climate change to the effect of xx tonnes of CO2.) Indeed it is noted the Strategic Plan sections 4.77 and 4.78 that Dust and vibration / Sound could impact on people. The effect of dust, especially PM2.5 particles is

proven to impact on health and as such strengthens the case that this monitoring indicator should be referenced next to the Air quality SA objective. Indeed the cumulative effects of small developments can have as significant effect as large developments (This is even noted on SA p140 (no 42) 4 Nations Air quality plan.) It stands to reason that if the cumulative effects on air quality are to be assessed then SA objective regarding air quality should have regards to monitoring of minerals development especially if that development is related to hydrocarbons. In table 14 assessment of Minerals development, Air quality is scored a negative, one would assume a linkage between the two to be coherent within the SA Objectives.

In SA objectives P41-43 the monitoring objective "Extent of Mineral Reserves and extracted Mineral assets" is included with regards to Objective 17(Land Soil Quality). However it doesn't appear next to Waste Management Objective (16. Waste/Materials). This again is incoherent as Large amounts of waste are produced by Minerals Extraction. There is no point patting oneself on the back with regards to domestic waste etc.. when industrial amounts of waste are being created in the area, and not being measured against the overall waste creation plan.

Flooding:

I note that chances of flooding is given as 1%, where 1% is described as a once in 100 year event. There has been much speculation with regards to climate change (indeed to the extent it should be called climate breakdown) that these once in a hundred years events are becoming more frequent. One doesn't need to be a mathematician to work out that if a once in a hundred event becomes a once in twenty years event, then 1% becomes 5%, and therefore the 1% flooding risk is not accurate. Whilst the true risk factor is not known, there is consensus among climate scientists that these events will be more frequent. I believe planning and stating 1% leads to a false sense of security and complacency in this respect. It may also lead to developments which are unsuitable because the risk was not adequately calculated.

Sustainable Development and Minerals Policy.

1.22 "Sustainable Development is defined in the Regional Development Strategy 2035 (RDS) as: "development that meets the need of the present without compromising the ability of future generations to meet their own needs"" while elsewhere its noted that ""There are three pillars to Sustainable Development: economic, social and environmental. The SA tries to find and gauge the impact of the policies and proposals (of the Plan Strategy) on these three pillars. Where these impacts are serious this might lead to those policies and proposals being changed. The SA might also lead to policies and proposals being improved"

Some comments in the SA seem to focus on the economic, whilst there is some discussion on the Environmental. The discussion and assessment of the social seems limited to a positive economic effect versus potential environmental effects. However, sustainable societies need an industry that in itself is inherently sustainable. Mineral extraction (some may call it wealth extraction) is by nature finite, and is generally specialised. This often requires bringing in specialist teams from outside the vicinity. The Minerals industry is often seen as a boom and bust industry. This doesn't seem to be discussed or assessed. A huge influx of outside money, workers etc will upset the existing social fabric. Another thing that needs to be assessed and noted is that these industries by

virtue of their licence have extraordinary powers, eg the power to enter onto land, the power to compulsory purchase, the power to erect on adjacent land ancillary works needed. Whilst there are some limits to these powers, and regardless of whether they are used or not, the very fact the industry may have these powers upsets the natural societal order. The SA needs to fully look at the social impacts of those licensed minerals projects such as licences for hydrocarbons and for valuable metals and ensure the short and long term impacts of those industries coming to the FODC area are properly assessed. Table 14 gives a positive to ‘Sustainable Economic Growth’, however this is not necessarily true. There are well known issues ie ‘the resource curse’, which includes ‘Dutch disease’, a lack of economic diversification, associated with finds of large minerals (hydrocarbons). It is therefore not a given that Minerals are positive in relation to ‘sustainable economic growth’ indeed, much of the evidence points to a negative.

It is noted that Minerals Policy within an ACMD is for developments of less than 15 years. It is not at all clear whether this applies to the cumulative development or to a single development within a project. Take for example the development scenario proposed by Tamboran for fracking. Each site would be approximately 2.5-5 hectares and there would have been one of these sites every square mile. The economic life of a shale gas well is short due to decline rates and its quite feasible that each well site would have a timescale of <15 years, however the project as a whole was envisaged for building all the sites and drilling all the wells to last at least 20-30 years. One can see how project splitting could cause an issue.

It is worth noting that a 15 year lifetime on developments within an ACMD is by default admitting that projects in an ACMD are not sustainable under the definitions used in the plan.

Cumulative Effects

There appears to be only 22 mentions of cumulative impacts in the SA document. The following is the short section composing just three paragraphs on cumulative impacts.

Cumulative impacts

5.4.

As part of the process of assessing impacts consideration has been given to whether there are any cumulative impacts. This would be the effects that result from changes caused by a policy or proposal in association with other policies or proposals. As noted above many of the policies and proposals maintain the policy framework provided for in the SPPS, and therefore the interactions between these policies and proposals will remain broadly the same. The matrices and discussion table at Appendix 4 do note instances where policies interact. None of these are considered to result in significant negative impacts. It is also noted that, given the strategic and operational nature of the policies and proposals, there would be more opportunities to explore cumulative impacts when local designations are identified at the LDP Local Policies Plan.

5.5.

The SA Matrices / Discussion Tables at Appendix 4 provide details of mitigation measures. There are no significant negative identified effects.

5.6.

Mitigation measures can be a combination of policies to prevent or reduce the severity of effects, such as the requirements to ensure the historic environment is protected or enhanced where considering all planning applications for new development. These are identified within the tables.

First of all its unclear whether cumulative impacts are taken into consideration within some of the policies themselves, which then makes it unclear how those are taken into account between policies.

I believe this whole area needs revisiting, and its not just good enough to state that mitigation measures will take care of cumulative effects. Further I can't believe that the conclusion that 'There are no significant negative identified effects' especially given some of the Policy assessments have question marks against all scores.

I believe a significant body of work needs to be done/redone in this domain. There is an inference because the policies are broadly similar to the framework proposals in the SPPS then cumulative impacts have already been assessed. This is Fermanagh and Omagh District Council and whilst I'm sure Belfast City Councils plan will also adhere to the broad framework proposals in the SPPS, there is a huge difference between the two areas. The mitigation options open to each would be different, as is the landscape, the outlook of the people, the water quality, air quality issues etc..

There appears to be a glossing over of transboundary cumulative impacts.

Take for example the cumulative impacts of Minerals exploration and extraction licences. Many stretch into other council areas. The areas under licence are huge. The cumulative effects of all these areas under exploration for minerals has a huge societal effect. I've already noted how the special powers these companies obtain through their licences tilt the balance of power within affected communities. In fairness this would be the same for any large development, or one where an in-ordinate amount of influence on society is granted because of economic influence of the development. The reality is that often plans decree some level of mitigation etc.. which is included so the development goes ahead, but that mitigation never materialises, or is different in nature, or is just outright ignored. I am unsure how that can be captured. It in essence profits are privatised and costs are socialised and this needs to be recognised somehow in the SA.

The Plan and the SA are sorely lacking in detail as to how they 1. assess cumulative impacts, and 2. mitigate the worst of these and 3. monitor them. Most importantly how do cumulative impacts affect sustainable development. It seems to me often that cumulative impacts can turn a sustainable development into an unsustainable one very easily and that point seems lost within the SA document.

I take issue with the following conclusion.

This SA Report has been published alongside the Local Development Plan Draft Plan Strategy for consultation purposes. Overall, it shows that there are mainly positive effects from the implementation of the policies of the Plan Strategy. There will be no significant negative effects from the plan, either individually or cumulatively. It is also considered that there are no transboundary effects.

As I do not consider that the appropriate cumulative assessments have been done properly and I'm unsure whether the transboundary effects of the policies can be said to have been properly considered.

Finally it needs be considered that cumulative impacts have been extensively dealt with in the Wind Energy paper and indeed are specifically mentioned in the Councils Policy on Renewables – in RE01 I believe there is scope for inclusion of the same in Minerals development especially given the fact there are many minerals licences granted and proposals for further licences for exploration and extraction ongoing in FODC area.

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