

Protecting Landscapes Team
Northern Ireland Environment Agency
Klondyke Building
Gasworks Business Park
Lower Ormeau Road
BELFAST
BT7 2JA
Attention of Ms S Howie

13 November 2009

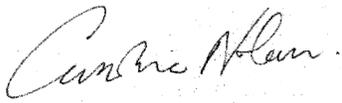
Dear Sandi

Please find below the Strangford Lough Management Advisory Committee's submission to the Department's *"Strangford and Lecale Proposals for Designation as an Area of Outstanding Natural Beauty – Your chance to shape the future landscape"*

- The AONB is designated by the Department based on landscape quality criteria. The fact that the boundary has been extended around Strangford Lough is an indication that the landscape is of high quality and that has to be welcomed.
- AONB designation is welcomed not least because of its direct benefit in terms of branding to the tourism industry.
- It is not clear whether or not the landscape that has been added to the AONB has improved since the last assessment or whether the criteria changed. Could the Department please clarify?
- Strangford & Lecale AONB should be treated as a single entity with a single management plan.
- Why is the Ards coast not listed as AONB – what criteria were used and how did the outer Ards fail to meet them?
- The Committee notes that the area around Comber has also been excluded? Is there any way that some of this area could be included especially in the vicinity of the Abbey?
- The Committee has mixed views as to the exclusion or inclusion of seascape within the AONB and members made the following comments.
 - It was felt that there needs to be a good and consistent rationale for inclusion.
 - The fact that the sea area south of St John's Point has been excluded seems extraordinary bearing in mind the beauty of that seascape extending to the Mourne's.
 - If seascapes are to be included then the assessment should be based on the current quality of the landscape / seascape, not on what uses the sea may be put to in the future if it is to be consistent.
 - What are the seascape criteria and how is the seaward boundary defined?
- Could the Department please clarify if the Food and Environment Act takes into account landscape / seascape considerations?

- There is a great deal of concern that resources are not being allocated to managing AONBs in Northern Ireland despite their pivotal role in fostering biodiversity, tourism, recreation and in providing access to the countryside. The Committee believes that this situation must change if AONBs are to be protected and to allow them to fulfil their environmental, social and economic potential.
- The Committee queries why a section between Dundrum Bay and Tyrella and adjacent farmland has been omitted. Our understanding is that the degradation in the landscape is an issue further inland but that the coast remains of high quality. The Committee recommends that this stretch is included in the Strangford Lough / Lecale AONB or the Mourne AONB. Please note that Down District Council have put measure in place to manage this area and it has been identified by them as an area suitable for the promotion of “green” tourism. Please note also that the District Policing Partnership have moved the boundaries of their areas of operation to enable them to police the byelaws introduced at Minerstown.
- The AONB designation does not have “teeth” and it seems that it does not afford any protection to the landscape that has been identified as being of high quality. If this is the case what measures are in place by government to ensure that the landscape quality remains high so that we do not lose these very special environmental resources in the future?
- The SLMAC was established by the Department of the Environment to provide advice with regard to the Protected Area’s strategic management. If the Strangford and Lecale AONB’s are combined then will the Department expect SLMAC to expand its geographic remit to incorporate Lecale which will have also have implications for representation on the Committee.
- In other AONBs the area partnership is charged with developing and delivering the AONB Management Plan. How does the Department see the Strangford and Lecale AONBs Management Plan being developed and who will be charged with delivering it? Is the expectation that SLMAC (or a future Advisory Partnership) will develop and / or implement the Plan and what would be the remit and resource implications of this?
- There should be some collaboration and integration across the adjacent AONBs – for example the sea plants etc around Rossglass and other locations within that area.

Yours sincerely



Caroline Nolan
Strangford Lough Officer

