

**Chloe Duddy**

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**From:** Hilda Clements <hilda.clements@fermanaghomagh.com>  
**Sent:** 23 January 2020 13:07  
**To:** Local Development Plan  
**Cc:** Deirdre McSorley  
**Subject:** Consultation Response to Derry City and Strabane District Council's LDP draft Plan Strategy  
**Attachments:** Response to DerryStrabane Draft PS 230120.pdf

Good afternoon,

Please find attached Fermanagh and Omagh District Council's response to the above consultation.

Regards,

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Fermanagh & Omagh  
District Council  
Comhairle Ceantair  
Fhear Manach agus na hÓmai

Your Ref

Our

Date 23<sup>rd</sup> January 2020

Planning LDP Team  
Derry City and Strabane District Council  
98 Strand Road  
Derry  
BT48 7NN

Planning Department

Dear Sir/Madam,

### **Consultation on Derry City and Strabane District Council's Local Development Plan (LDP 2032): Draft Plan Strategy**

Fermanagh and Omagh District Council welcomes the opportunity to respond to the above consultation and wish to congratulate Derry City and Strabane District Council in achieving this key milestone in the LDP process. We also wish to acknowledge the participatory role of the Council in the two cross boundary working groups, the Sperrins and Cross Border Forums, of which our Council is also a member. We look forward to continuing to work together on addressing key issues affecting both our respective districts.

Having reviewed the document, Fermanagh and Omagh District Council have noted and where appropriate, commented upon the Draft Plan Strategy under the following headings which are areas of mutual interest and common ground as discussed at the two forums:

#### ***Meeting Peoples Needs/Accommodating Growth***

We note that Derry City and Strabane's Growth Strategy has a growth target of 9,000 homes which is in excess of the 2016 HGI of 4,100. It is argued that given current build rates, and the Council's Strategic Growth Plan which aspires to grow the district's population to 160,000 by 2032, this housing figure is a reasonable target to aim for. Of this 9,000, the share of housing to be allocated to the countryside, is 12-16% (1,080-1,440).

In terms of jobs, the Growth Strategy aims for the creation of 15,000 jobs and the LDP will safeguard existing employment lands and continue to focus economic development opportunities in Derry, Strabane and the local towns, in their centres, in dedicated employment areas and through other opportunities. The scale, extent and location of all employment opportunity areas will be confirmed at the Local Policies Plan (LPP) stage.

The Spatial Strategy sets out Derry City and Strabane's settlement hierarchy, main environmental areas and other main infrastructure features, as well as the general spatial strategy for Derry City and Strabane town. The settlement hierarchy has 5 tiers – City, Main Town, Local Towns, Villages and Small Settlements. The LDP Plan Strategy is for more-balanced growth across the District, having a degree of focus on Derry City as well as Strabane to a lesser extent. This is broadly in line with the Regional Development Strategy (RDS). Beyond the five tiers of 'settlement' is the open countryside where new rural policy will provide opportunities for appropriate development to sustain vibrant rural areas and their communities.

In keeping with the SPPS, the Draft Plan Strategy adopts a town centre first approach which recognises the key role that Derry City centre plays as the primary location for retailing and other related uses within the region. It also recognises the role that Strabane town centre plays as a key centre with its own catchment. A proposed retail hierarchy of centres is provided under Designation HC 1.

The Council also notes with interest the idea for a feasibility study for a 'Resilient form of Settlement' as a one-off pilot project to demonstrate best-practice in terms of 'sustainable development' and 'adaptation to climate change.' This would be considered at the LPP stage. It is also noted that to contribute to carbon offsetting, planting of compensatory trees will be encouraged in most developments where there is the removal of trees or other vegetation to facilitate a proposal. In rural locations, this may involve the planting of a small woodland of native species (20 x 20 metres). We would commend the Council for this initiative.

### ***Road Linkages and Transport Infrastructure***

The Council notes the inclusion of Local Transport Study (LTS) Transport Measures for public transport, roads, walking, cycling and strategic parking for the period up to 2032. Of common interest to both our Councils is the proposed A5 scheme which will reduce journey times and improve journey time reliability for all users in the wider North West region. It is recognised that the focus of most of the transport measures will be on Derry City and Strabane town where there is the greatest opportunity to deliver a modal shift to more sustainable forms of transport and to better integrate transportation and land use. Outside Derry and Strabane, the Council will seek increased frequency/provision of rural public transport routes. Fermanagh and Omagh District Council also share this approach in order to improve access to rural areas and reduce social exclusion.

### ***Protection of Sensitive Landscapes***

The Draft Plan Strategy introduces Special Countryside Areas (SCAs) and Areas of High Landscape Importance (AHLIs) but it is noted that detailed boundaries and development guidance for individual AHLIs will not be included until the LPP stage. The open mountain landscape of the Sperrin AONB which contains the high summits (Sawel, Dart, the Moat, etc) is designated as an SCA. Part of this SCA, a linear portion on the southern side of the Glenelly Valley, rises up to a similar area of designation within the Fermanagh and Omagh District. This ensures that the most remote, exposed and undeveloped portions of the AONB are afforded similar protection in our respective Draft Plan Strategies. The SCA will also be designated as an Area of Mineral Constraint.

We note the designation of Development Pressure Areas (DPAs) which will be identified at LPP stage. These are localised areas that are under particular development pressure such that further unacceptable development would cause significant harm to the appearance and character of the countryside. Within DPAs, the same policy tests for Green Belts (Policy GB1) will apply.

The draft Plan Strategy also designates Wind Energy Capacity Areas (WECA) which are localised areas of the District that have experienced significant pressure (existing operational and approved) from wind farms and single turbines and so need careful consideration of any further such proposals. Indicative locations of these areas are shown on Proposals Map No 2 but the actual locations and detailed boundaries will be shown at LPP stage.

You will be aware that Fermanagh and Omagh's Draft Plan Strategy contains a Wind Energy Strategy which identifies the capacity of different landscape areas for wind energy development. This strategy is underpinned by a commissioned Landscape Wind Energy Capacity Study which identified 'limited or no capacity' for turbines within the Sperrin AONB given its designation as a nationally valued landscape. Where some locations may be suitable for single or small turbine groupings - such as within the more enclosed parts of valley landscapes - the turbines would be limited to the 'medium' size (<80m).

### ***Mineral Development***

Minerals development is an important activity in both our districts. However, our respective LDPs recognise that the industry presents a number of challenges, including impact on the environment and impact on the amenity of local residents.

We support the Plan's introduction of Areas of Constraint on Mineral Development (ACMDs) into parts of the District to protect particularly sensitive landscapes in the High Sperrins, Glenelly valley, Faughan valley and Foyle river corridor. The Council may also identify Mineral Reserve Areas (MRAs) in the LPP. Detailed boundaries of MRAs and ACMDs will be defined at LPP stage. SCAs and AHLIs will also be subject to the policy for ACMDs.

We have also noted Policy MIN 4 Valuable Minerals which applies to minerals which are limited in occurrence and with some uncommon or valuable property. It also refers to unconventional hydrocarbon extraction and that there will be a presumption against their exploitation until there is sufficient and robust evidence on all environmental impacts. This is in keeping with the SPPS.

### ***Tourism***

We are supportive of the tourism strategy which is in line with regional policy and aims to support and facilitate appropriate sustainable tourism development. This means channelling tourism development to potential tourism growth areas, particularly to the key settlements and where they are sensitively related to the District's tourism assets. Thus, Tourism Hubs (Derry and Strabane), Gateways (e.g. Claudy, Plumbridge) and Historic Villages (e.g. Sion Mills) are important to welcome and encourage any future tourism developments in these parts of the District. As you aware, in our Draft Plan Strategy, we refer to Tourism Hubs in the countryside - clusters of existing tourism development associated with a tourist attraction - where tourism development will be directed to, outside of settlements. Within the Sperrin AONB, Gortin and An Creagan are considered to be Tourism Hubs and would thus complement those settlements identified for tourism development within your district.

As acknowledged within the LDP Draft Plan Strategy, our two councils along with adjoining Districts are co-operating with regard to the Future Search and the Sperrins Forum for the ongoing management of the Sperrins.

### ***Protection of River Corridors***

One of the other areas where participation and co-operation on the Sperrins Forum has been beneficial is through the inclusion of a policy to protect our main river corridors. We therefore support Policy NE 4 Development adjacent to Main Rivers and Open Water Bodies which aims to protect the landscape adjacent to the River Foyle and its tributaries, the Faughan and its tributaries and other main rivers as designated by the Drainage Council (NI) as 'Main' rivers. Our draft Plan Strategy has a similar policy, OSR05 for Development Adjacent to a Main River.

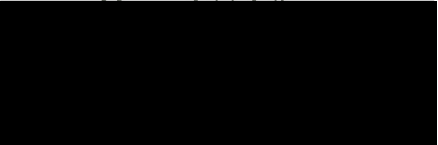
### ***Improvement to Broadband Infrastructure***

We are also pleased to note the provision of Policy UT 4 Future-Proofing of developments for Utility Services and Broadband which applies to all new residential developments of 5 units or more or other commercial developments of over 500m<sup>2</sup>. The policy is similar to our policy PU03 Accommodating Future Broadband and other Public Services.

### ***Conclusion***

Fermanagh and Omagh District Council considers that the contents of your Draft Plan Strategy are not in conflict with our Council's Draft Plan Strategy, although we recognise that in addressing specific issues such as minerals development and wind energy development in the Sperrin AONB, our policy approaches have developed slightly differently.

We will continue to liaise and consult with your Council at the appropriate stages of our LDP as well as continuing to engage with your Planning Officers through informal meetings and through the Sperrins and Cross Border Forums.



Deirdre McSorley  
Head of Planning