

DERRY CITY & STRABANE DISTRICT COUNCIL

**LOCAL DEVELOPMENT
PLAN (LDP) 2032**



LDP Preferred Options Paper (POP) – Representations Summary List

Received 31st May – 22nd August 2017

Preamble

In response to the Preferred Options Paper (POP) consultation, 127 responses representing a wide range of stakeholder interests were received. These have been reviewed, analysed and summarized in the following table. This document should be read in conjunction with the main Interim Representations Report (IRR), which provides further detail of the legislative requirements, processes and emerging themes and issues raised during this first formal consultation stage.

No:	Name	Summary of Issues Raised
1.	Historic Environment Division, Dept. for Communities	<ul style="list-style-type: none"> - Consistency of use of text – prefer <i>‘historic environment’</i>. - Highlights importance of using updated data sets; strategies, relevant plans and programmes and promotion of heritage as a tourism offer. - Prioritise use of vacant / underused Listed/ Non Listed buildings; and Offer suggested supplementary wording for identified policy gaps. - Built Env / Heritage: Seek to ensure heritage is an important part of the Masterplan. - Built Env / Heritage: Potential for Walled City, surrounding area & Ebrington to be managed in line with <i>UNESCO Historic Urban Landscape</i> approach. - Built Env / Heritage: Ensure those villages and towns with a strong historic character are nurtured and developed by the LDP. - Policy - Built Heritage: While generally supportive of retention of current operation policy, HED highlight certain policies gaps which additional policy / wording to SPPS / PPS 6 policies could help address. Significant input / suggested rewording is provided to PPS 6 / SPPS and DAP policies - Settlements: Place Making and Design Vision – HED considers any policy framework for the development and regeneration of settlements through place making and design vision should have the contribution of the historic environment at its core. - Interim Rural Proofing – concern that perceived relaxing of rural policy could impact negatively on historic environment assets. - Interim Rural Proofing – HED welcome the reuse of vacant or underused historic buildings in the countryside which they consider would benefit community cohesion, vitality and tourism in the area. - EQIA – HED advise that altering a Listed Building for people with a disability in line with DDA may require dispensation to protect historic fabric of the building. - More amplification is required regarding the historic environment and Listed Buildings in the DCSDC area which is disproportionate to the social, economic & environmental contribution that it makes to the District. - Useful if SA provides break down of number of LB and their Grades and give examples of significant or Grade A listed buildings. - Ensure full definition of Listed Building as per Art 80 of the Planning Act (NI) 2011. - Consider preparing a list of non-designated Historic Buildings of Local Importance. Record only buildings on HED LB Database may be of assistance. - Ensure scheduled historic monuments are specifically discussed. - Page 159 App 4 include a list of supplied additional plans and programmes. Also note book <i>Island City (R O’ Baoill)</i> would be useful. - HED concerned not all relevant key sustainability issues within the District have been identified. - HED don’t agree with the appraisal of each of the options against the SA objectives in relation to scoring of SA Objective 14.

- Section 6 Issue 6A Spatial Strategy – agree with outcome & provide additional bespoke comment.
- Issue 6B - Agrees with outcome.
- Section 7 Economy. Issue 7A Economic Development Land– HED consider they can't score without knowledge of zonings.
- Issue 7B City / Town Centres – additional comment provided.
- Issue 7C Retailing Capacity – alternative scoring suggested with supporting text.
- Issue 7D Derry City Centre - alternative scoring suggested with supporting text.
- Issue 7E Strabane Town Centre – agrees with scoring and additional text submitted.
- Issue 7F Local Towns - alternative scoring suggested with supporting text.
- Issue 7G Transport - alternative scoring suggested with supporting text.
- Issue 7H Tourism - agrees with scoring and additional text submitted.
- Issue 7I Minerals - alternative scoring suggested with supporting text.
- Issue 7J Rural Economy - alternative scoring suggested with supporting text.
- Section 8 Social Development. Issue 8A Strategic Housing Distribution - agrees with scoring and additional text submitted.
- Issue 8B Housing Allocation quantum - agrees with scoring and additional text submitted.
- Issue 8C Location and allocation of housing land - alternative scoring suggested with supporting text.
- Issue 8D social / affordable housing & balanced communities - alternative scoring suggested with supporting text.
- Issue 8E Open Space & Recreation - agrees with scoring and additional text submitted.
- Section 9 Environment Issue 9A Natural Environment - alternative scoring suggested with supporting text.
- Issue 9B Landscape Character - agrees with scoring.
- Issue 9C Coastal Development - alternative scoring suggested with supporting text.
- Issue 9D Built Environment - alternative scoring suggested with supporting text.
- Issue 9E Urban Design / Places - agrees with scoring and additional text submitted.
- Issue 9F Renewables Wind/Solar - alternative scoring suggested with supporting text.
- Issue 9G Flooding - alternative scoring suggested with supporting text.
- Issue 9H Transport Environmentally & People Friendly - agrees with scoring and additional text submitted.
- HED don't agree with measures to reduce negative effects & promote positive effects – supporting comment provided. Essential to use historic baseline evidence.
- HED provide a list of opportunities to promote the historic environment in DCSDC.
- HED provide list of projects related to historic environment which should be referenced in the LDP: UNESCO Historic Urban Landscape Approach; develop the heritage tourism potential of the Foyle and Faughan Valleys; nurture the potential of named historic settlements; ensure heritage is an important part of the Masterplan for the reinvigoration of Strabane.
- HED keen to be referred to in LDP Glossary and stress need for LDP to utilise evidence bases and articulate clear mitigation to offset impacts on historic environment.

2.	Geological Survey NI/Minerals, Dept. for Economy	<ul style="list-style-type: none"> - Clarification of key words, include reference to specific published documents. - Refer to unique issues associated with surface and underground mining. - Support for mineral policy which will seek to minimise / eliminate potential risk to environmental health; stresses potential for shallow geothermal resources for heating and cooling; stresses SuDs. - Need for policy for high value minerals, highlight importance of sand and gravel production within our District and overall, stresses the positive contribution to the economy, growth, health and well-being of this District from sustainable mineral development.
3.	Mid Ulster Council	<ul style="list-style-type: none"> - Work together on minerals / renewable energy on AONB other sensitive landscapes. - Work together and support Tourism Conservation Zones. - Rural development – support enhanced opportunities for such. - Transport – A5 & A6 vital and Councils should work together; also supportive of active travel & improving connectivity between settlements.
4.	Fermanagh and Omagh District Council	<ul style="list-style-type: none"> - Broad agreement across most areas. - Particularly supportive of sensitive Landscape Zones being protected from Renewables projects. - Suggest Council cooperation on Sperrin AONB policy development.
5.	NI Water	<ul style="list-style-type: none"> - Provided info before. Reiterated NI Water does not envisage any substantive issues re water supply that will impinge on new development across the district. - Provided sewerage network info – capacity and connections for District settlements. - Economic development Land: Provided info before. Reiterated NI Water does not envisage any substantive issues re water supply that will impinge on new development across the district. - Location and Allocation of Housing Land: Provided info before. Reiterated NI Water does not envisage any substantive issues re water supply that will impinge on new development across the district. - Waste: Provided sewerage network info – capacity and connections for District settlements.
6.	North West Development Office, Dept. for Communities	<ul style="list-style-type: none"> - Growth strategy – Considers that Brexit will have a negative impact on growth and it may be optimistic to expect growth much higher than current NISRA projections. - Derry City Centre – rationalise city centre boundary – just one needed. - Transport – NWDO request a Car Park Strategy and consideration of Brexit impacts. - Minerals: would prefer to see more emphasis on protecting environment as NWDO believe natural heritage is a big part of our tourism attraction. - Housing Allocation Quantum - don't agree with growth strategy due to Brexit. Believe it will have a negative impact on growth and it may be optimistic to expect growth much higher than current NISRA projections. Housing figures are linked to growth hence replicated comments for Growth Strategy.

		<ul style="list-style-type: none"> - Open Space, Sports and Recreation – careful consideration needs to be given to open space in 70/80’s housing developments – is it causing anti-social problems. Supports more recreational space. - Urban Design / Places – LDP should designate specific Design Areas. - Environmentally & people friendly transport – developers should contribute more in terms of cycle paths / walkways. - Place Making & Design Vision – would prefer to see more than a Vision for each area – perhaps more detailed guidance / principals.
7.	Historic Monuments Council, Dept. for Communities	<ul style="list-style-type: none"> - A statutory council appointed to advise the Department for Communities on the exercise of its powers under the Historic Monuments & Archaeological Objects Order (NI) 1995. HMC liaised with HED (DfC) in preparing its submission. - Commends council on production and clarity of POP. - Recommends that richness and diversity of the heritage (natural, historic & built) should be fully acknowledged across POP e.g. River Foyle, valley & catchment. - Use term “historic environment” in future documents. - Recommend an integrated management approach to heritage assets – natural & cultural heritage as intertwined. - Clarify use of lists of heritage assets to inform the evidence base. - HMC recommends that a full and detailed audit / condition survey of all historic environment assets should be compiled as part of the evidence base. - Correct terminology to include medieval and prehistoric period. Section 2.7 should particularly note Monuments in State Care (14) and Scheduled Monuments (128). Error pointed out ref: Statistics pg7 of HE Evidence Paper pg. 22 of POP itself section 2.24. - Pg. 23 POP Sec 2.30 – make reference to whole landscape of the District being important for the people who live there – approach of the European Landscape Convention (2000) and DOE (2000) & DAERA (2016). - Clarity of Vision & Objectives is welcomed but HMC strongly recommend that three headings of social , economic and environment are treated as being integrated, rather than separate pillars. - Welcomes Environment Objective (POP pg. 39). - POP pg. 102 9.1 remove reference to Strabane’s ‘former’ canal heritage. Heritage continues to be there. - HMC welcomes proactive approach to the protection of natural and historic environment but somewhat disappointed that preferred option for built environment / heritage is only in line with current PPS / SPPS. Disappointed that Council has (with its deserved reputation for holding historic environment in high regard) chosen not to take on task of identifying and considering locally significant built heritage. This approach is at odds with other proactive approach for preferred options. - HMC considers for management of the environment to be effective it requires comprehensive baseline data on all aspects of the environment and expertise to accurately assess. LDP should clearly detail approach to integrated management of the environment and mitigation of impacts. - POP pg. 120 – 126 Retain policy BH5 in light of current state of discussion about possibility of seeking World Heritage status for Derry-Londonderry. - Concluding comment – happy to assist and offer advice. Critical to success of preferred options that LDP / Council has appropriate resources and expertise to identify archaeological / built heritage assets and their setting and assess how proposed development might impact on them.

8.	Natural Environment Division, DAERA	<ul style="list-style-type: none"> - Clarification on various relevant points of policy and guidance. - Clarity sought on relevant objectives, some reordering suggested. - Feel unable to comment on Spatial Distribution / Social development due to lack of detail. - Disagree with chosen preferred option for Natural Environment & Built Environment / Heritage. - Encourage Council to undertake their own up to date local landscape study and also reference to Seascape Character Areas. - Welcome protection of sensitive locations within AONB's from renewables. - No mention of SuDs within POP. - Highlights some policy concerns amongst support for other approaches. - Highlights some internal business area terminology. - Section 2 – note Coastal area due to physical overlap between marine and terrestrial planning systems. - Section 3 – Section 58 of MCAA 2009 “have regard to appropriate marine policy documents when taking any decision...” legally applies to LDP. - Section 3.2 – Biodiversity Strategy Implementation Plan under review not Bio Strategy itself. - Section 4 Vision & Objectives – welcome specific reference to improvement in water quality in the District ('good' status by 2021) in line with Water Framework Directive. - LDP should strive to play a role in improving water quality in District. WFD objectives not currently being met in District. Need to contribute should be explicit in LDP Strategic Objectives. - Clarity of environmental objectives and need to include Green Infrastructure. - Suggest an additional environmental objective to encourage all aspects e.g. of classification, management and monitoring in relation to plan area landscapes. - Section 6 – lack of detail for Option 3. - Section 7 Economy – welcome re-evaluation of economic development land. - Section 7 Transport – designs associated with A5,6 & 2 upgrades strongly encouraged to include green infrastructure. - Section 7 Tourism – ensure protection of tourism assets and settings due to degradation from tourism growth. - Section 7 Minerals – welcome ACMD due to active peat extraction. - Section 7 Rural Economy – Social Development – concern for “opportunities for additional dwellings in countryside”. Mitigation and potential numbers required to allow consideration. - Section 8 Location & Allocation of Housing Land - re-evaluation of zoned lands environmentally important. - Section 8 OSSR – Note re-evaluation and concerned at term “underutilised” – infers all open space must be used by people. - Section 9 Nat Environment – consider Option 2 over option 1. A review of local nature conservation sites needs to be undertaken. Derry sites identified 17 years ago. Strabane has none. Helpful web link provided. Opposed to Option 3 – council would not comply with biodiversity duty. - Section 9 Landscape Character - expand Option 2 and undertake up to date LCA for the plan area. List all plan area landscape designations. - Section 9 Coastal – objective required to protect undeveloped coast. - Section 9 Built Environment / Heritage – consider option 2 rather than option 1 should be the preferred option. LLPA's likely to be required and surveys undertaken to deliver these designations.
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		<ul style="list-style-type: none"> - Section 9 Urban Design / Places – welcome option 2 and recommend high quality design includes green infrastructure (GI). GI guidance note recently issued. Prefer high design levels across all development rather than restricted to designated design areas. Such design could include ecological networks. - Section 9 Renewables – welcome protection of most sensitive locations in AONBS & SPAs. Note no reference to other renewables - biomass which can be negative for air quality. - Section 9 Flooding – agree with approach. - Section 9 Environmentally & People Friendly Transport – welcome option and approach. - Section 9 Transport – welcome GI encouragement into development. Will require strong policy wording. Consider that transport and GI should be considered as two separate issues (para 9.48). - Section 9 Environment Issues and Options – improving water quality & River Basin Mgt Plans is a significant gap in POP. No mention of Suds either. - Section 10 Policy PPS2 Nat Env – para 10.3 & 10 .6 conflict. Clarification needed if LDP is to be quiet on nature conservation policy. - Section 10 Policy PPS 6 Built Heritage – para 10.3 7 10.12 conflict. Clarity required. LLPA’s policy required consistent with SSPS para 6.29/30. - Section 10 Policy PPS 8 recreation OS – para 10.3 conflicts with para 10.16 concern over stated review of these policies to allow greater flexibility in terms of potential adverse impacts. - Section 10 Policy PPS18 Renewable Energy – clarification over usual para conflict. Suggest height restrictions. - Section 10 Policy PPS 21 – concerns over potential for enhanced opportunities in relation to new dwellings in countryside. - Section 11 Settlements & Place Making – welcome this and visions should include protection and enhancement of distinctive landscape character, views and setting. Include GI. - Baseline Evidence – Marine section needs to recognise marine legislative requirements. - EVB 2 context – include section 58 MCAA. - EVB 9 reference forthcoming MPNI. Undertake LCA and include Seascape Character Areas. - EVB 10 ship wrecks included in App 1 but no section non Marine considerations. - EVB 17 – Marine plan being produced by DAERA (as Marine Plan authority) not DOE. DAERA Marine Division should be amended to Marine and Fisheries Division. - NED generally content and supplies following comments for inclusion in next stage of SA. - Page 13: 2.3.5 even where positive effects outweigh negative effects, the point of the exercise is to identify and mitigate (significant) negative effects. - Issue 8B – Housing Allocation Quantum – it is not clear that mitigation measures are included to reduce negative effects due to WWTW. - Pg. 90: 6.12.4 River Foyle Tributaries (Derg & Finn) and Faughan are also important salmon rivers. - Pg. 90 sustainability issues – importance of peat has not been highlighted in terms of biodiversity and as a carbon sink. - Pg. 99 Sustainability Objectives “...adapt to climate change” needs reference to peat and woodland as carbon sinks. - Pg. 104 Appendix 3 – NED suggest <u>there is a link</u> between housing and protection of water, natural resources & landscape character. - Pg. 105-59 Appendix 4 – include Local Biodiversity Action Document <i>Wildlife Action in Derry Londonderry 2008-13</i> & <i>Strabane District Council Biodiversity Awareness Survey Baseline Report 2011</i>. - Pg. 170 Objective 9 include tree planting and protection of existing trees as positive mitigation measures.
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		<ul style="list-style-type: none"> - Pg. 171 – ‘Adopt to Climate Change’ second bullet point add “<i>or managed retreat</i>”. - Air quality S6.9.1 amend to ‘...<i>levels of certain substances such as nitrogen dioxide, sulphur dioxide or...</i>’ . - S6.9.2 NED provide links to useful monitoring reports (Inc. Black Carbon report) for insights on emissions from residential heating. - Pg. 70 Emissions Agriculture – ‘<i>This indicates other sources of emissions</i>’ should be ‘<i>This indicates the greater contribution of other emissions sources, for example, cattle manure management, in comparison with emissions from fertilisers</i>’. - S 6.9.4 (& Summary table pg170) Include solid fuel burning. Evidence of substantial levels of solid fuel burning in Strabane – see Black Carbon report link above. - Water Quality. WMU of the opinion that Sustainability Objective 11 should be split to form 2 separate objectives- one focussed on water quality and water as a resource, the other should focus on flooding. - Climate Mitigation comments: NED request remove current text and replace with provided text at state sections / paragraphs. - Marine Coastal – Marine Plan team acknowledge good reference to main Marine issues within the document. MPT stress need that LDP ensures regard is given to UK MPS at various stated locations in the Interim SA report.
9.	DAERA – Forestry Service	<ul style="list-style-type: none"> - Economic Objectives A (v) – FS welcomes the objective to promote renewable resources as consistent with afforestation and sustainable forest management. - State 161.3 ha of grant aided Short Rotation Coppice within our District. Planted for biomass for renewable energy market. - Environment Objectives C (i) welcomes promotion of health and well-being and enhancement of natural environment to achieve biodiversity. FS actively collaborates with Council on trails etc. in Learmount, Glenderg, and Slievedoo. 96 kms of forest road and paths within council area. - Environment Objectives C (iv) welcomes objective to protect and enhance network of open spaces and opportunities to enhance pedestrian paths, cycle-ways, and ecological corridors. - Section 9 Environment (A) Natural Environment – as per PPS2 NH5, FS requests that Council through policy / guidelines do not permit development on ancient or long established woodland sites. - Section 9 Environment (F) Renewables - FS states there are 161.3 ha of SRC within council area providing a source of biomass to the renewable energy market. - Section 9 Flooding G – FS states woodland has the ability to “slow the flow” and alleviate downstream impacts. FS research indicates 47, 915ha of potentially high priority land for the creation of woodland to assist in flood risk mitigation.
10.	Loughs Agency	<ul style="list-style-type: none"> - POP disregards tourism potential of the rural areas – particularly Foyle system and its water based tourism products. - Evidence supplied – 3 activity tourism operators, many angling guides as well as specialist accommodation providers. - Foyle has much potential for river cruise boat. - P38 Social Development Objectives – include reference to potential of Foyle as a neutral and uncontested space for recreation, leisure and relaxation. - P39 amend ‘coastline and wetlands’ to include shorelines, rivers, lakes, canals, and wetlands. - P39 include ‘greenways and blueways’ in list provided in (ix).

11.	Invest NI	<ul style="list-style-type: none"> - INI only commenting on the needs of those companies which meet its intervention criteria. Suggests Council engages with representatives of these sectors that fall outside INI scope. - INI underlines the importance of providing a choice and variety of sites across the Plan area to respond to the changing nature and requirements of business and industry. - INI welcomes proposed new policies for enhanced opportunities in the countryside so as to sustain vibrant rural areas and their communities. - INI strongly supportive of para 7.7 (POP pg. 63) and compatibility with nearby uses when considering location of employment land. Requires strong policy protection akin to PPS 4 PED 8 to ensure other uses do not adversely impact or inhibit economic development. - Note emphasis placed on ensuring sites are more sustainably / accessibly located. Microbusinesses incubator / start up units / digital economy to complement Fort George and Ebrington will be important. - INI has no objection to re-evaluation of economic zoning as long as the exercise does not see a reduction in the overall supply of available land. - With reference to both local and strategic sites, useful if Council provides investors with guidance on range of uses it would deem to be acceptable. - Also suggested that Council should set out KSR highlighting any necessary infrastructural work and potential studies / assessments that they may be asked as a minimum by consultees. - Mixed use sites – INI encourage Council to ensure that in any plans for MUD, industrial elements are separate from other uses and preferably served by different access points. - City / town centre – INI stresses that key to ensuring town and city centre vitality will be ensuring appropriate balance of uses. - Transport – welcome any supporting transport assessment particularly in light of Council plans to re-evaluate all current economic zonings. This would be in line with RDS (RG1). - Rural Economy – INI welcome potential for continued economic development opportunities in the countryside. Limited local growth will allow them to reach a stage of financial capability to make a move affordable in due course. - Built Heritage – can continue to contribute towards economic growth and vitality. Can either serve as modern industrial use with sympathetic restoration or where not possible could potentially serve as office / workspace provision. - Planning policies – INI opposed to any loss of land currently or previously used for industrial purposes to other uses. Happy to engage with Council with review of PPS4. - Planning Agreements – caution against developer contributions for public sector developments where wider societal benefits are the driving force rather than profit.
12.	Dept. for Infrastructure	<p>DFI Representation analysis:-</p> <ul style="list-style-type: none"> - Overarching consideration - DFI response focuses primarily on how the POP has taken account of the RDS, SPPS, and other policy and guidance issued by the Department. The response highlights where, in the Department’s view, aspects of the proposed approach may pose a risk to LDP soundness, or where evidence of the soundness of proposals is not immediately clear. - Annex 1 – DFI Planning Divisions; - Annex 2 – Transport Planning & Modelling Unit, Transport NI Western Division, Rivers Agency & Water & Drainage Policy Division. - Annex 1 Analysis – General Comments:

		<ul style="list-style-type: none"> - Refers to DPPN (Development Plan Practice Note 5, 7 & 8 and use of these to provide additional guidance and the evidence base to underpin proposals. - Highlights occasional POP use of term ‘broad conformity’. Relevant soundness test is for LDP to ‘take account of’. - Highlights that PPS policies were not subject to any SA in the POP process and indicates carrying forward may mean these provisions should be subject to SA inc. SEA. - Stresses need for policies and allocations to be realistic and founded on a sound evidence base. - Welcomes co-operation between Council and Donegal Co. Council, especially in relation to facilitating housing growth. - Stresses need for consideration of sustainable development in all aspects of planning. <p>Annex 1 Analysis – District Profile:</p> <ul style="list-style-type: none"> - Reminded that District Survey is a requirement of Planning Act 2011 and will contribute to establishment of baseline profile. <p>Annex 1 Analysis – Policy Context:</p> <ul style="list-style-type: none"> - Stated that this section provides a good overview. Highlighted we should also have regard to “Water – A Long Term Water Strategy for NI 2015-2040”. <p>Annex 1 Analysis – LDP Vision & Objectives:</p> <ul style="list-style-type: none"> - Consideration should be given to developing a bespoke LDP vision which draws upon the Community Plan but is more locally distinctive and land use orientated. - DFI notes 25 objections. Consideration should be given to reducing the overall number of objectives and making them more concise and easier to monitor. Monitoring will be a legislative requirement. - Classification of objectives (economic, social & env.) is supported but rationale for classification is not always clear. <p>Annex 1 Analysis – Growth Strategy for District:</p> <ul style="list-style-type: none"> - Disjoint between para 5.3 (modest pop growth) and later evidence in support of preferred option. - Preferred Option is ‘largely’ based on 2008 NISRA projections. DFI considers there is no clear rationale for using older data. - DFI consider that the growth strategy for the LDP should be more clearly linked with the Draft Strategic Growth Plan. - DFI consider growth scenarios should be subject to SA. <p>Annex 1 Analysis – Spatial Strategy:</p> <ul style="list-style-type: none"> - Overall Spatial Distribution: - DFI consider the options presented are limited and lacking in detail. Council is reminded of RDS aim to strengthen role of Derry and to grow population of Hubs in order to counter disproportionate amount of growth in smaller settlements in recent years. - Preferred Option 2 does not articulate the need for further opportunities in the Countryside or the proposed departure from the SPPS policy approach. - Option 2 would not support the RDS objective to grow population of hubs and hub clusters. <p>Settlement Tier Evaluation:</p> <ul style="list-style-type: none"> - Welcome proposed hierarchy but query text re “limiting other nearby settlements that would detract “. The RDS promotes cooperation between places that complement the role of Derry & Strabane. - Text needed to highlight potential for Strabane to cluster with Derry. - Council needs to ensure that the assessment of Claudy supports its designation as a Local Town.
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- Query whether the proposal to designate new small settlements is supportive of RDS SFG12 & 13. References Evidence Paper 4 that identifies potential settlements, many with limited sewerage infrastructure / capacity.
- Annex 1 Analysis – Economy Issues & Options:**
- Economic Development Land:**
- Application of the RDS Employment Land Evaluation Framework would have assisted in the generation of more relevant options. DFI refers to EVB 6 which identifies Option 2 as the preferred option. POP preference is Option 3.
- DFI state that Economic development land allocations should be realistic and founded on a robust evidence base.
- DFI emphasise the need for a coherent approach whereby the preferred growth scenario and economic development land allocation are aligned and consistent with each other.
- DFI stress that proposals for ‘strategic’ economic development sites close to the new A5 & A6 or any protected transport corridor should be very carefully considered.
- DFI reminds that RDS SFG11 aims to promote economic development opportunities at the hubs and only in the rural area with exceptions.
- City / Town Centres – generally:**
- DFI acknowledge the Profile and Policy Context as a good overview section.
- DFI reminds that SPPS para 6.276 is to retain & consolidate existing District and local centres and ensure their role is complementary to that of the town centre. No further extension in such centres where adverse impact is likely on the town centres.
- Comment that Option 3 is contrary to regional planning policy.
- Up to date town centre health checks required. Reliance on summarised third party 10 year old reports (GL Hearn) questioned.
- Retailing Capacity:**
- Suggests earlier work on Retail Capacity Study would have assisted the generation of Options.
- Ensure preferred Option 3 is consistent with para. 6.276 of the SPPS
- Derry City Centre:**
- Welcomes further studies to be undertaken and reminds of the need for a ‘call for sites’ consultation exercise.
- Strabane Town Centre:**
- Preferred Option is ambiguous and section would have benefitted from greater pull through of the evidence base to assist in the appraisal of options and provide rationale for the preferred approach.
- Local Towns:**
- DFI state not apparent how preferred Option was arrived at.
- Transport:**
- DFI considers these options do not fully represent an integrated approach to land-use and transport. Options do not acknowledge or discuss the most effective ways of achieving a modal shift to more sustainable forms of transport.
- Reminder re SPPS & PPS3 AMP3 affording protection to key transport corridors.
- DFI reiterates need for LDP & Local Transport Plan processes to be integrated and to influence each other.
- DFI draws Council attention to SPPS para 6.301 which outlines strategic policy to be taken into account in the preparation of the LDPs.
- DFI welcomes strong links between LDP objectives and Councils Community Plan.
- CODA – Councils attention drawn to para 6.247 SPPS.

		<ul style="list-style-type: none"> - No direct reference in Economic Section to Port. Tourism: - DFI considers a revised objective to promote tourism development more generally throughout the district, including rural areas. - Preferred option needs to clarify that it will protect / safeguard tourism assets. - SSPS requires a Tourism Strategy. Policy Option 3 does not take account of regional strategic policy which is to facilitate sustainable tourism development. Minerals: - Council is reminded that options should be set within the regional policy context established by the RDS / SPPS. DFI welcomes further studies as proposed by Council and these will assist Council to further develop and refine evidence base for Minerals. - Mineral policies of the PSRNI to be carried forward should be subject to SA. Rural Economy: - DFI concerned at the possible sustainability implications of the preferred approach – especially new business starts and small businesses in the countryside. - LDP policy should seek to apply regional strategic policy at a local level. Any departure from SPPS policy must be supported by a robust evidential context. - Background evidence papers do not provide evidence in relation to the existing economic development uses in the countryside or the identified business needs of the rural area. No supporting evidence presented regarding a pressing need or a lack of opportunity. - Strong reminder that all options should be set within regional policy context. Annex 1 Analysis – Social Development – Issues and Options: - DFI seeking further clarification on the proposed approach to addressing the issue of the current commitments that the Council has identified. - DFI question the suggestion the discrepancy between the HGI and the extant housing zonings may influence the density of housing development. This, they state, should be addressed through the LDP process. - Reminded of SPPS provision relating to maintenance of 5 year housing supply. Strategic Housing Distribution - Options: - More detail in relation to the options would aid understanding of the implications of each. Text is ‘vague’. - Evidence base is required to establish in more detail the quantum and distribution of housing allocation. Robust evidence base required if departing from policy context. Housing Allocation Quantum – Options: - DFI stress HGI is for guidance and not a cap or target to be achieved. Also policy neutral and makes no allowance for the RDS objective of developing a strong NW centred on Derry. - Evidence is not clear to support required new homes. Council should adopt a consistent approach to the use of current data / evidence. - The plan evidence does not clearly identify the appropriate evidence to underpin the growth strategy or clearly link this strategy with the planned quantum of housing. - Noted that preferred option on housing allocation quantum is silent on the proportion of social housing required to meet assessed need. Location and Allocation of Housing Land:
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		<ul style="list-style-type: none"> - DfI acknowledges Council will undertake an exercise to evaluate these lands to determine their current status and any constraints to their development. Further discussion helpful in understanding options and why they were not selected. Social / Affordable Housing & Balanced Communities: - Clarification is sought by POP text on 'more research is required by DfI, DFC, NIHE & Council. Open Space, Sports and Recreation: - DfI refers to SPPS para 6.205 general policy presumption against loss of open space and references Council admission with position paper that they are unclear as to what exactly the existing OS provisions is. Community Infrastructure – Options: - Council has not established at this stage a baseline evidence position that would enable it to generate more specific options. More sharing of evidence from statutory consultees is required to build the evidence base to inform the LDP. Waste: - Council must assess the likely extent of future waste management facilities for the District and identify specific sites for the development of waste management facilities in the LDP. Council must also engage with local authorities in the RoI to promote a co-ordinated regional approach. Water & Waste Water Infrastructure: - Council should ensure Community Plan actions are fully reflected in the LDP - Continued liaison with NIW encouraged. Annex 1 Analysis – Environment – Issues and Options: Natural Environment: - DfI request justification for selection of Option 1 over Option 2. Landscape Character: - References dated studies and seeks clarification on whether Council has carried out its own assessment. Consider relationship between preferred option and renewable energy preferred option. Coastal Development: - DfI query one option approach. A no plan scenario is suggested. - Suggest Council consider SSPS policy is relevant and appropriate to local circumstances for Coastal development, economic development, natural environment etc. Built Environment / Heritage: - Preferred option should not preclude the protection of additional built heritage assets through the LDP process. Urban Design / Places - DfI happy with this approach. Renewables - Wind / Solar: - Reminded Options should be set within regional policy. Clarity required why policy options only refer to wind and solar energy. - Spatial restrictions require elaboration. Council reminded that in addition to landscape sensitivity, the location of renewable energy development requires consideration of a range of factors. - Impacts of turbines on CODA radar.
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		<p>Flooding:</p> <ul style="list-style-type: none"> - Suggests that the LDP should address flood risk from all sources. - 2030 epoch changing to 2080 epoch mapping. DFI stresses SPPS para 6.129 “no sites or zone lands that may be susceptible to flooding now or in the future.” - DFI would prefer no amendments to technically complex PPS15 policies. - Liaison important with relevant agencies. <p>Transport – Environment & People friendly:</p> <ul style="list-style-type: none"> - Any new revised policy must consider regional strategic objectives under para 6.297 of SPPS. - Spatial Growth Strategy & use of Accessibility Analysis offer potential to promote environmentally and people friendly environments and work towards draft PFG outcomes. <p>Telecommunications:</p> <ul style="list-style-type: none"> - Questions whether Environment Objective that references Telecoms should be an Economic Objective. Notes lack of policy option for consultation. <p>Review of Planning Policies – LDP Approach & Options</p> <ul style="list-style-type: none"> - DFI remind Council that PPS 18 review is on-going and it is to be completed, including any necessary amendments to the SPPS by the end of 2018. - DFI will also undertake work in relation to spatial planning and infrastructure delivery to serve as a vision at a regional level up to 2050. <p>Settlements – Place Making and Design Vision:</p> <p>Generally content with overarching policy reminders re rural design.</p> <p>Annex 2 – Specific DFI Business area summary of comments:</p> <p>Transport Planning & Modelling Unit:</p> <ul style="list-style-type: none"> - TMPU state if city of Derry is to grow, it must be able to accommodate greater numbers of people who must be able to move around the City. - There needs to be a greater focus on identifying locations that are accessible by walking, cycling and public transport and ensuring that - Development in these locations are a suitably high density. - POP has not made sufficient reference to or taken cognisance of the existing Ulsterbus Foyle bus network - More emphasis needed on the role of the Derry hub as a key public transport node linking the city to other key hubs and gateways. - A5/A6 Council should capitalise on the potential strategic car and Goldline journey time savings. - Car parking strategies should be used to inform the LDP. - Walking and cycling accessibility should be a key and early consideration in site selection. - POP should draw out clearly the links between the plan objectives and transport and identify a number of realistic strategic options. - Strategic options explicitly relating to transport are not considered to be sufficient. TPMU provide alternative example. <p>Transport NI – Western Unit:</p> <ul style="list-style-type: none"> - Comments reflect overarching DFI main Annex 1 comments. <p>Rivers:</p> <ul style="list-style-type: none"> - Encouraged by references to flood risk and flood risk management. However Rivers suggest that dealing with flood risk from all sources should be given a greater importance in the LDP.
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		<ul style="list-style-type: none"> - Rivers keen to liaise closely with Council in preparation of the LDP. <p>Water & Drainage Policy Division</p> <ul style="list-style-type: none"> - Comments reflect overarching DFI main Annex 1 comments. - Council should liaise with NI Water to ensure growth can be targeted in areas where capacity is available. - Council should consider the potential use of open space to resolve flooding issues, create more open amenity space and promote health and well-being through the introduction of SuDS.
13.	Causeway Coast and Glens Borough Council	<ul style="list-style-type: none"> - CC&G agree with all preferred options as set out in each of the POP sections. No comments made in Policy, Place Making, Interim Rural Proofing or EQIA documents.
14.	SSE Electricity	<ul style="list-style-type: none"> - Summary: supports POP Vision and aims with following recommendations that next stage of LDP must take into account. LDP must recognise that NI has one of the best wind resources in Europe from which significant socio-economic benefit can be realised. - As well as local economy investment and associated benefits, wind can deliver recreation and tourism opportunities. - LDP needs to recognise that onshore wind can support social objectives of the POP through community benefit funds. - LDP needs to recognise that onshore wind energy development can meet climate change obligations under POP environmental objectives. It is a most cost effective and deliverable technology. - SSE prefer current planning policy SPPS / PPS18 / PPS2 rather than LDP imposing area wide prohibitions. Do not want area defined prohibitions or restrictions on high structures within AONBs or other landscape designations.
15.	City of Derry Airport	<ul style="list-style-type: none"> - Future development and growth of CODA should be considered in the LDP. (Useful CODA stats provided). - CODA passenger numbers declining due to Air Passenger Duty (APD). Stated UK APD rate is up to 8.5 times the European average and this is inhibiting CODAs ability to attract new carriers and routes to NW region. - LDP must recognise economic importance of tourism. Promote NW region as a destination for high quality investment with excellent air connectivity and high quality transport infrastructure.
16.	(RES)Renewable Energy Systems	<ul style="list-style-type: none"> - RES encourages Council to plan for powering the anticipated growth of the District through promotion of renewable energy infrastructure and make provision for energy storage infrastructure. - RES encourages Council to reflect the wider climate agenda and drive decarbonisation in its LDP and be proactive in reducing reliance on non-renewable energy. - RES concerned that important contribution of a renewable energy supply is absent from POP baseline consideration of energy infrastructure. - RES considers POP's economic objective jars with proposed renewable policies at Section 9. Correlation between District energy needs up to 2032 and energy supply ought to be fully considered prior to imposition of suggestive restrictive renewable energy policies. RES states this has implications for SEA – unclear whether all factors have been duly considered. - RES state and emphasise that onshore wind energy is acknowledged by UK Government as offering the cheapest form of energy.

		<ul style="list-style-type: none"> - RES urge Council to have regard to all relevant material considerations supplied (Pg. 11/12 RES rep) before finalising LDP renewable energy policies. - Restrictions based on visual impacts fail to properly assess environmental benefits that renewables have in off-setting no renewable energy use. - RES very concerned that POP Options (9f) are polarising to the detriment of a reasoned and balanced approach. - RES would encourage Council to reflect and adopt SPPS policy & criteria and embrace Circular Economy approach. - RES encourages Council to consider a positive plan policy that supports redevelopment, repowering and expansion of existing wind farm sites and also co-location of R E technologies at existing sites. - RES encourages Council to provide provision for retrofitting of energy storage units adjoining existing sites and at new locations. - LDP should make provision to ensure adequate power supply is accessible across NI. - RES stresses policies should not be based on outdated or extant Government targets. PAC have adjudicated in 2007 that 2020 target of 40% of electricity consumption from renewable sources should be seen <i>as a rolling target and not a cap upon achievement</i>. - RES concerned that Council are under-planning for future energy consumption. Draft PFG & Paris Agreement point to a future direction that seeks to promote further growth of a renewable energy sector. - RES strongly object to POP inference that no further provision is required during plan period. In support RES states that removal of NIRO means it is likely not all consented projects will be delivered; many wind farms coming to the end of their consented lifetime; decommissioning needs to be factored into plan policies. - RES concerned that policies regarding Landscape Character are unfairly weighted against the restriction of certain types of development – POP inference is windfarms. - Option 2 fails to identify what landscape capacity is – how will this assessment be made? Ambiguous nature of Option 2 calls into question soundness of policy proposal. RES prefer Option 1. - Useful renewable energy evidence attached in RES Appendix 1
17.	Brookfield Renewables	<ul style="list-style-type: none"> - Brookfield Renewable (BR) strongly suggest that the LDP and any associated policies should unambiguously align with national policies, frameworks and strategies such as PPS18 & SPPS. - Brookfield does not feel that additional spatial restrictions are necessary. They are likely to have a negative investment potential in renewables within the District & reduce Districts ability to contribute to current / future energy targets. - Renewables – Brookfield urge the Council to insert specific renewable energy targets which will enable the plan to facilitate the development of clean technologies and renewable energy generation in a planned and integrated fashion suitable for all Council area. - Suggest following wording “The LDP will review and revise the scope of the existing policies to promote the delivery of a planned and integrated renewable energy generation supply appropriate for the Derry City and Strabane District Council. - Brookfield believes a new Facilitation of Renewables Study should be undertaken to examine the technical challenges in delivering renewable energy, and how to support increased volumes of wind & diversified renewables mix.
18.	Gaelectric	<ul style="list-style-type: none"> - Supports the NIRIG submission to the POP. - Gaelectric consider any associated policies should unambiguously align with national policies, frameworks and strategies such as PPS18 & SPPS.

		<ul style="list-style-type: none"> - Gaelectric does not feel that additional spatial restrictions are necessary. They are likely to have a negative investment potential on renewables within the District & reduce Districts ability to contribute to current / future energy targets. - Council should focus on economic benefits – investment, generating jobs, strengthening grid and reducing harmful emissions and over-reliance on imported fossil fuels. - Suggests that Council is proactive in enabling development of storage facilities for electricity. - Gaelectric not keen on spatial restrictions and prefer existing assessment process which uses sensitive design and findings of a robust EIA / Landscape & Visual Impact Assessment.
19.	NIHE	<ul style="list-style-type: none"> - OVERALL: Strongly supports planned management of land supported by robust evidence base. Appreciate SA summary under each text section. Welcome further discussion with Council on housing matters. - POLICY CONTEXT: Draft Pg. needs to be factored into LDP. - VISION & OBJECTIVES: Pro city / town centre living. - GROWTH STRATEGY: Clarify figures used in growth strategy. Supportive of growth figures beyond HGI's. Pro phasing of future housing land - SPATIAL STRATEGY: Eglinton should be kept as a small town. - OVERALL SPATIAL DISTRIBUTION: Consider population growth spatially across District to aid decision making. - ECONOMY: Agree with economic growth and seek social clause in planning agreements. - DERRY CITY CENTRE: clarify definition and role and study appropriateness of these boundaries of the CA & CC. promote mixed uses in the centre. City/ town centre living needs to be encouraged – especially affordable accommodation suitable for single households. - STRABANE TOWN CENTRE: Consolidate Strabane Town centre retail boundaries. - TOURISM; agrees with Preferred Option. - TRANSPORT: agrees with Preferred Option. - LOCAL TOWNS: Do not see the need for town centres for Claudy or Newtownstewart. - MINERAL: ACMD beneficial in sensitive areas. - RURAL ECONOMY: Pro sequential test for rural economic development. Development should primarily be located within settlement limits. - STRATEGIC HOUSING DISTRIBUTION: LDP should limit growth of dispersed, single dwellings in the countryside. - LOCATION 7 ALLOCATION OF HOUSING LAND: Housing sites need to be robustly tested for suitability, availability and deliverability. - MEETING THE NEEDS OF ALL: Affordable housing definition (social rented housing & intermediate housing) needs to be set out as per SPPS. - Like to see an affordable housing policy promote social housing development in mixed tenure developments – reasoning included. - HEX supports a development management approach to the provision of affordable housing in the plan strategy. Reasoning included. - Strongly supports developer contributions for affordable housing development and happy to discuss form and implementation of a suitable policy with Council. - Like to see planned development through strategic policy / LPP allocation for affordable housing in rural area. Those instances of rising and unforeseen need to be catered for by exception policies (similar to CTY5 - PPS21). - Like to see retention of CTY5 Protocol (DOE/NIHE2010). - HOUSING MIX: Like to see a policy in the PS ensuring an appropriate mix of housing. - ACCESSIBLE HOUSING: Like to see a policy in the PS which caters for all those with specialist needs – supporting evidence included.

		<ul style="list-style-type: none"> - SUPPORTED HOUSING: Like to see a policy in the PS for Supported Housing (SH – Individuals who cannot live independently in their own home) – supporting evidence included. - TRAVELLER ACCOMODATION: Travellers needs to be adequately catered for – retain HS3 / PPS12 or SPPS policy. - DESIGN QUALITY IN RESIDENTIAL DEVELOPMENT: Supportive of high standards of design and housing future proofing. Keen to see guidance with LDP on minimum space standards, open space, active travel and providing safe and secure neighbourhoods. Landscape proposals should be required for all housing developments where communal open space is required. - Secured by Design should be included in LDP. - OPEN SPACE: HEX strongly supports Option 2 to identify and protect Open Space – reasoning included. - HEX strongly support the selective redevelopment of portions of open space. LDP to provide an exception clause limited to development that provides a ‘substantial community benefit’ <u>Affordable Housing (social and intermediate housing) to be defined within policy as a “substantial community benefit”.</u> - COMMUNITY INFRASTRUCTURE: HEX agrees option 1 should be preferred option re community infrastructure – reasoning included. Also like to see HIA undertaken for major developments to promote active travel and use of OS. - Keen that the LDP should promote community cohesion. - WASTE: HEX supports waste policy approach. - ENVIRONMENT – Nat Env: HEX while supportive of Nat Env Option 1 considers that scope exists for additional protection as set out in Option 2. - Plant more trees (furthering biodiversity) as part of new developments – reasoning included. OS can also be managed to enhance biodiversity. - LANDSCAPE CHARACTER: HEX agrees with preferred option 2. - COASTAL DEVELOPMENT: HEX agrees with option 2. - BUILT ENVIRONMENT - Heritage: HEX agrees with preferred option 1. - URBAN DESIGN/PLACES: strongly supportive of a place making approach. Relevant urban guidance / supplementary planning policies / DCANS to be included and promotion of Lifetime Neighbourhoods principles. - RENEWABLES: HEX supports option 2 but keen to see this as part of a more holistic approach to developing energy policies. HEX keen on Energy efficient development and would strongly support a minimum BREEAM or EPC/SAP rating for new buildings. - FLOODING: HEX keen to see comprehensive policy in PS to deal with all aspects of flooding - prevention and mitigation. Promote SuDs. - ENVIRONMENTALLY & PEOPLE FRIENDLY TRANSPORT: HEX supports option 1. - PLANNING POLICY REVIEW: notes 18, 21 4 & 16 requiring fundamental review and keen to see all policies replicated and retained and given adequate weight in the LDP to drive the plan led system.PPS 15 – extra clarification needed reservoirs FLD 5. - SETTLEMENTS – PLACEMAKING & DESIGN VISION: HEX welcomes place shaping approach for the outlined settlements. - ADDITIONAL: Consider integrating Culmore into Derry City development limits on account of vast majority of private sector housing development having taken place there. - ADDITIONAL: POP doesn’t tackle imbalance in terms of social and private housing development through the City. - ADDITIONAL: Lack of clarity as to selection of Claudy, Newtownstewart and Castlederg as local towns and omission of Eglinton. - ADDITIONAL: LDP needs to really focus and be stronger on enhancing local biodiversity. - ADDITIONAL: better text on explaining links to community plan would be beneficial.
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20.	Cllr David Ramsey, DUP DCSDC	<ul style="list-style-type: none"> - Concern about the change in policy relating to proposed farm dwellings in 2014 the policy was changed to not permit land owners who let their farm land not have planning permission for a family dwelling. Concern that young families will not be able to establish themselves in the Countryside and this will have a major impact on the rural population.
21.	Mark H Durkan MLA	<ul style="list-style-type: none"> - Agrees with the proposed vision for the LDP. - Agrees with the proposed objectives for the LDP. - Preferred Option in 5.4 population growth, additional jobs and new homes proposed in the growth strategy. Agrees however important we look at providing suitable homes to attract people back into Council area who have moved to Donegal – as well as creating economic opportunities to drive growth. - City/Town Centres – city centre first. - Retailing Capacity. Difficult (or impossible) to do but consideration should be given to potential impact of future events i.e. Brexit on retail here. - Derry City Centre. Evaluate the existing central area and commercial core within cityside and waterside, clarifying/simplifying their definitions roles and adjusting their boundaries if necessary. - Tourism. Exploit flexibilities afforded within PPS16. - Location and Allocation of Housing Land. Understand council’s preference for option 2 but while 3 would undoubtedly be less straightforward it would eventually have a better outcome. Plan in haste, repent at leisure. - Social and Affordable Housing and balanced communities. Agree – identifying mechanism to achieve not easy – developer contribution? Need to ensure private development on the Westbank is encouraged. Social housing but protection from speculative developers wanting social housing on unzoned land. Need the necessary infrastructure for social housing. Should have a minimum requirement for social housing of bungalows and lifetime homes. - Section PPSs. PSS4 agree with additional opportunities for small businesses. Also flexibility around ‘industrial’ areas to reflect changes in economy are essential. - PPS17 – should demonstrate awareness of and make provision for new technology – LED signage. - PPS21 – 6 year criteria should be looked at for those who had emigrated and returned to farm. Work of DAERA on number of farm IDS. - Planning agreements and community benefits – useful tools in other areas. Benefits should be significant and sustainable. Look at community benefits derived from Wind Energy applications in Scotland. - Agree with Vision and objectives. - Agree with preferred option as set out in section 5.4 – target levels of population growth, additional jobs, and new homes proposed in the Growth Strategy. - City Centre Town First approach. - Retailing capacity – difficult or impossible to do but consideration should be given to potential impact of future events i.e. Brexit on retail here. - Tourism – exploit flexibilities afforded within PPS16. - Location and Allocation of Housing Land. Understand Council’s preference for Option 2 but while 3 would undoubtedly be less straightforward it would (eventually) have a better outcome. Plan in haste, repent at leisure. - Open Space, Sports and Recreation. No mention of biodiversity in Sustainability Appraisal Summary of Option 2? Agree that some informal open space is underutilised ... but how is that measured? Does lack of ‘use’ render an open as surplus to requirements and mean that it is not

		<p>viewed as a resource with value to neighbouring residents and others? Alternatively, some open spaces cause heartaches for residents and this should be considered on an application by application basis.</p> <ul style="list-style-type: none"> - Community Infrastructure. Also important to consider future uses of existing sites as we are likely to see rationalisation of education, health and security estate. - Waste – should look at infrastructure within new developments to include communal recycling facilities and promote circular economy and move towards zero-waste. - Natural Environment. Option 2 favourable in terms of environmental protection. Seems like Option 1 preferred as less work required. Plan needs to be clear and strong. - Landscape Character. ‘Sustainable development’ and ‘case by case’ being the operative terms. ‘Blanket banning’ of types of development in area deemed to be ‘at capacity’ does not allow for technological advances or changes that we might see in these types of development in coming years. - Coastal Development – need to consider any ROI plans as we share coastline. - Built Environment/Heritage. Option 1 Too restrictive in application. When we have a massive rate of vacant premises in city centre, prohibiting small businesses from installing shutters (not particularly insensitive ones) etc. is counter- intuitive. I believe that Option 3 provides a wee bit more flexibility. Protection of built heritage is important but it should not be a barrier to sensible and sensitive proposals to support economic development. - Renewables. Important to strike balance and establish what/where is ‘most sensitive’. Sensitivity is in the eye of the beholder and Council should be able to realise the wider economic and environmental benefits of renewables. - Flooding. Mitigation always possible in theory but rarely affordable.
22.	Cllr Dan Kelly	<ul style="list-style-type: none"> - Sections 1- 3 of the POP. The unsatisfactory and incomplete statement at paragraph 2.4 suggesting that the dispersed pattern of rural settlement ‘creates challenges for service provision – especially in the more rural and remote areas of the District’ needs to be addressed. The inference being that it would be much simple if such rural settlements didn’t exist. - Section 4 – Vision and Objectives – agrees with vision DCSDC must ensure that Economic Objective (iii) does not negatively limit the opportunities for the establishment, growth and expansion of rural businesses based in a rural location. By proposing to inhibit growth in rural communities to that “which reflects the extent of existing rural communities,” DCSDC must ensure that Social Development Objective (iii) does not negatively impact on the Councils Vision for a district which provides “equality of opportunity for all.” - DCSDC must take a more explicit stance in terms of its responsibilities towards the Sperrins Area of Outstanding Natural Beauty. Environment Objective (viii) fails to explicitly reference the AONB while explicitly referencing Derry City. This is an incongruous position to adopt and then attempt to defend. The ‘traditional approach’ identified and promoted at 4.5 to advance the outlined objectives has failed to protect the district from wind farm blight. - Section 5 – Growth Strategy Do you agree with the Preferred Options as set out in Section 5.4, and specifically the target levels of a) population growth, b) additional jobs, and c) new homes proposed in the Growth Strategy of the LDP? Yes Comment: As long as there are proper mitigations inbuilt to ensure consistent growth across the District and not allowing gravitational forces to concentrate growth in the city. - Section 6 Spatial Strategy Overall Spatial Strategy (Please refer to Section 6.18 of the Preferred Options Paper for full details).Do you agree with the Preferred Option? If not, please suggest and justify any alternative options.

		<ul style="list-style-type: none"> - Option 3: Balanced Growth. Comment: Welcome the commitment from DCSDC to balanced growth across the District, especially given that after city dwellers, countryside dwellers make up the largest population grouping at 14.4%. - Settlement Hierarchy (Please refer to Section 6.21 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Existing 49 retained. Reservations on rationalising centre on the fact the Council has not proposed how it intends to spatially drive balanced growth across the District (6.18) while failing to designate/redesignate settlements in the Sperrins in line with previous strategies. Glenmornan and Cranagh need to be redesignated as villages. No direction on open countryside which is beyond the hierarchy tier - 14.4% of the population live here. Without identifying those settlements which may be upgraded/downgraded, it is not possible to know whether merely ‘considering’ enhanced development opportunities in the remoter rural areas is a good enough commitment from DCSDC when responding to spatial growth needs. - Section: Economy. Economic Development Land (Please refer to Section 7.14 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 3: Re-evaluate. - City / Town Centres Generally (Please refer to Section 7.21 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2: Balanced. - Retailing Capacity (Please refer to Section 7.27 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 3: Monitor. - Derry City Centre (Please refer to Section 7.30 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Evaluate. - Strabane Town Centre (Please refer to Section 7.37 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Maintain & Re-evaluate Comment: Re-evaluation must include the Strabane-Lifford corridor. - Local Towns (Please refer to Section 7.44 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Retain. Comment: Proposals for local towns are welcome but this paper makes no proposals for the Sperrins Area. In terms of spatial growth Glenmornan and Cranagh need to be re-designated as villages as envisaged in the earlier West Tyrone Area Plan. - Transport (Please refer to Section 7.49 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Plan to maximise comment: The dualling of the N14 (Strabane-Letterkenny) needs to be explicitly referenced. It is unclear from the wording whether the commitment to Active Travel is solely for main urban settlements or across the District. - Tourism (Please refer to Section 7.60 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Identify Flagship. The DCSDC LDP options need to make proper provision for the Sperrins which unlike Derry City has not been specifically referenced. - Minerals (Please refer to Section 7.67 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 3: Balanced. - Rural Economy (Please refer to Section 7.72 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2: Balanced. DCSDC must ensure that the implementation of any definition for “appropriate scale development” does not become a barrier to promotion of vibrant rural communities. Accommodation must be made for
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		<p>non-farming rural business opportunities. DCSDC must explain the anomalous statistical inclusion of only 50 people across the entire District employed in farming in 2015 (table 4) - this is clearly a false figure.</p> <ul style="list-style-type: none"> - Strategic Housing Distribution (Please refer to Section 8.7 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 3: As the second largest settlement tier at 14.4%, DCSDC must make proper accommodation in the LDP for countryside development - including non-farming development. - Housing Allocation Quantum (Please refer to Section 8.15 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2: Balanced. - Location and Allocation of Housing Land (Please refer to Section 8.19 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2: Retain. DCSDC should make provision (as compensatory allocation) within those settlements/areas for land which was previously zoned for housing but which is now mapped as flood zone in the updated flood risk maps. - Social / Affordable Housing and Balanced Communities (Please refer to Section 8.30 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Incorporate. DCSDC need to include provision in the LDP for social/affordable housing in 'countryside' locations (as part of the extended settlement hierarchy) which cannot be accommodated by NIHE/Housing Associations to date because planning policy does not make provision for it as an option outside of a settlement. 14.4% of the DCSDC population reside in the open countryside - out of a total district population of more than 30% rural dwellers. - Open Space, Sports and Recreation (Please refer to Section 8.34 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2: Re-evaluate. - Community Infrastructure (Please refer to Section 8.40 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Identify/Zone/Protect. - Waste (Please refer to Section 8.45 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Comment: DCSDC need to make allowances for those identified new sites within this LDP which were not identified as part of the previous two LDP's. - Section 9 Environment. Natural Environment (Please refer to Section 9.9 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2. Existing policies have failed/failing designated sites. - Landscape Character (Please refer to Section 9.11 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2: Informed by LDP Development Pressure. - Coastal Development (Please refer to Section 9.18 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: (only 1 option referenced). Given our maritime location, it is important that DCSDC also reference Irish Maritime Policy. - Built Environment/Heritage (Please refer to Section 9.23 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: Existing Designated. - Urban Design/Places (Please refer to Section 9.28 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2: It is already too late for some of our settlements, nevertheless, damage can be mitigated by introducing good quality design at this late stage.
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		<ul style="list-style-type: none"> - Renewables (Please refer to Section 9.28 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2. - Flooding (Please refer to Section 9.41 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 2. - Environmentally and people-friendly transport (Please refer to Section 9.46 of the Preferred Options Paper for full details). Do you agree with the Preferred Option? If not, please suggest and justify any alternative options: Option 1: (only 1 option referenced). - Section 10 Planning Policy Statements. Section 10 Policy Review (PPSs) Do you have any comment to make on this Section? Make your comment below: PPS 18 and PPS 21 require fundamental reform to reflect the local circumstances in the Tyrone part of DCSDC. The 2010 Landscape Character Assessments are significantly out of date and provides no protection to the Sperrin Area of Outstanding Natural Beauty. The 2008 West Tyrone Landscape Assessment commissioned by the then DOE concluded W. Tyrone had at that time reached “saturation point” in terms of wind turbine density. PPS 21 does not enable broad based rural regeneration - instead it enforces sprawling suburban style housing estates concentrated in rural villages and hamlets. PPS 21 precludes any rural development beyond farming and farm diversification. This needs substantive amendment in the new LDP. - Section 11 – Settlements – Place making and vision. Section 11 Place-making and design vision. Do you have any comment to make on this Section? Make your comment below: Rural villages/settlements are losing their purpose and character under current planning policy. As a result they end up being nothing more than dormitory settlements - with a population base simply supporting larger urban settlements. - Interim Rural Proofing Document. Interim Rural Proofing Document. Do you have any comment to make on this document? Make your comment below: Welcome DCSDC’s commitment to Rural Proofing and the practical out workings and benefits this will bring to the large rural area and statistically significant rural population of the district. - Interim EQIA. Do you have any comment to make on this document? Make your comment below: Welcome DCSDC’s commitment to Equality.
23.	Slaughtmanus Conservation Group	<ul style="list-style-type: none"> - The area contained within a section of the county enclosed by Highland Hill, Loughermore, Ness woods and a line parallel to and bordering Myrtle road extending as far as Listress be designated the same status as Ness Woods/Bonds Glen and Ervey. Rationale provided in letter i.e. part of Faughan valley ASSI ; enclosed area between Eglinton and Claudy offering unique scenery within area; status as part of setting to Ballygroll archaeological site; status lying between Altahullion and Ness; part of national cycle route.
24.	Foyleside Shopping Centre	<ul style="list-style-type: none"> - Proposals to commission a comprehensive up to date retail capacity study should include detailed consultation with owners/developers with existing retail interests. - An opportunity exists to redevelop the site opposite Foyleside shopping centre i.e. the East Car park, the coach park and the former tourist information centre – redevelopment of this area could facilitate the provision of retail space to meet demand and introduce leisure in the city centre and for large scale retail users and would address the frontage onto the River Foyle. There is limited reference within the POP to its recommendation for leisure. - The city centre needs a leisure facility within the commercial core and a wider choice of daytime/evening leisure options within the retail core. - The evidence base should be robust to ensure it meets the test of soundness and it stands up to testing within the retail assessments of application submitted outside the retail core.

		<ul style="list-style-type: none"> - The option to clarify the meaning of the Central Area and the Commercial Core is welcomed. Focus of development should be on the commercial core, as the traditional shopping core of Derry.
25.	NI Renewables Industry Group	<ul style="list-style-type: none"> - A significant percentage of the renewable energy development in NI has taken place in DCSDC area with sizeable economic benefits; - NIRIG welcomes that no operational policy issues have been identified within PPS18 but concerned about the introduction of new spatial restrictions. - Council needs to develop an ambitious plan for low carbon urban areas which will deliver economic, environmental and health benefits.
26.	Friends of the Derry Walls	<ul style="list-style-type: none"> - Not enough attention to Derry Walls; does not quantify the significant deterioration of the setting of walls. No new vision for the walled city. No planning framework which would inspire and guide property owners and public realm agencies on how to achieve such a new vision. - The LDP continues to be passive, prioritising private car over public transport, cycling and walking. The Walled city continues to be dominated by surface car parking and private cars circulating within historic streets for these spaces. - The LDP is critical to the achievement of the Draft Tourism Strategy.
27.	The Wee Greenway Initiative	<ul style="list-style-type: none"> - Further to submission last May – - G Transport options – if the car remains the focus of regional development and the number one transport option, then it may be difficult for Derry to be a ‘sustainable city’. - Council has an opportunity to become a pathfinder for other urban and rural areas in Ireland and abroad. The plan does contain many positive aspects and ideas. - However the lack of environmentally friendly infrastructure does not bode well for a sustainable city. There is no plan for adding cycle routes to other major road arteries such as the Strand Road, Foyle Road, Northland Road, Limavady Road and Dungiven Road. How do you propose people will find their way to the new greenway routes being developed in Derry and Strabane as part of the North West greenway network (greenway network 9 Section 7.56). - A more concrete plan for cycling infrastructure as without such a plan it will be difficult for the environmental objectives to be met (page 39).
28.	QPANI	<ul style="list-style-type: none"> - QPANI would ask that Council identifies Mineral Safeguarding (Reserve) Areas around existing operational sites to prevent inappropriate development that would sterilise future construction aggregate reserves and impact on the day to day operation of existing sites. QPANI is adamantly opposed to Areas of Mineral Constraint. - Opposed to any policy that would introduce prejudicial constraint on mineral development in AONBs. - QPANI has proof that significance of impact is perceived and not supported by the reality of reports. - Any restoration plan should take account of enhancing and protecting any priority species identified in the local area and enhancing any designation in the locality. - The LDP should also consider alternative forms of use following mineral extraction is complete and restoration and aftercare of land is complete such as new habitats and biodiversity, use of agriculture, forestry etc. - Some former mineral sites may also be used as landfill facilities. - The Quarry industry has a very proud record of good practice and guardianship of local biodiversity.

		<ul style="list-style-type: none"> - Quarries can be important sites for biodiversity and an important resource for geological education, training and research. - It is a sector in which biodiversity is actively being addressed. - Planning proposals need to be carefully designed and managed with opportunities in the restoration and after-use plans. - Needs to be collaboration between different interest groups and the industry to develop ecosystems approaches to long-term minerals planning. - Mineral and aggregates extraction has the potential to negatively impact on landscapes but with modern standards possible impacts can be significantly mitigated. - Aggregate and mineral reserves within AONBs are vital to the economy. - QPANI encourage the Council to identify and adopt mineral safeguarding areas. - The total employed in the industry is around 200 which includes those involved in ‘downstream’ manufacturing. - Achieving many of the social, economic and economic objectives set out in the Councils Growth Strategy will be dependent on the availability of local and responsibly sourced minerals and aggregates. - Council’s multi-million pound capital project plan will be dependent on local construction materials and skill. - A need to speak individually with local quarry operators to assess mineral reserve they have within their current planning permission, the tonnage reserve they have in their ownership and the average annual extraction tonnage.
29.	Glen Development Initiative	<ul style="list-style-type: none"> - Agree with the proposed vision as set out in the POP.
30.	Foyle Civic Trust	<ul style="list-style-type: none"> - Agrees with overall proposed vision for the LDP. - Agrees with the proposed objectives for the POP. - Overall Spatial Strategy – a primary focus on the sustainable development and enhancement of the Derry and Strabane urban areas is more likely to attract inward investment and to generate higher skill and value economic activity to the benefit of the District and the North West as a whole. This would also fully meet the relevant objectives of the RDS 20135. - City/Town Centres. Preferred option would be to focus on existing centres, limited development in District Centres and constraint on outer/arterial sites. - Tourism – since the main tourism assets of the District are based on the natural environment and the historic built environment specific reference to the need for their conservation and sustainability should be included in any option. To be sustainable ‘flagship’ sites and associated development must fully respect their local environments. - Rural Economy – some further definition of the kinds of business which would be considered ‘appropriate’ in the countryside is needed. - Strategic Housing Distribution – the preferred option should be amended to state a primary focus on Derry and Strabane but with other opportunities across the settlement tiers. - Location and allocation of housing land – does committed land mean land for which planning permission is extant? Existing zoned land for which planning has not been sought should be re-evaluated on the basis of sustainability. - Social/affordable housing – this is a complex and sensitive issues – appropriate research and academic research should be carried out and a suitable mechanism for local circumstances should be identified. - Waste – could/should these two options not be incorporated into a single option?

		- Natural Environment – options 1 and 2 should be combined.
31.	Londonderry YMCA	- Very little mention in the POP about Drumahoe and Eglinton. Is Drumahoe between two stools – Faughan and Altnagelvin?
32.	Woodland Trust	<ul style="list-style-type: none"> - Plan Strategy - While Ancient Woodland is mentioned in spatial characteristics of the POP, not all areas are recorded on the District Context map. - The move towards ‘place-shaping’ is welcomed. - Vision and Objectives - Woodland Trust agree with the over-arching aim of a ‘thriving, prosperous and sustainable’ place. - WT welcome the commitment to protect and enhance the natural and built environment and would call on the Plan Strategy to afford the same level of protection to important environmental assets, such as ancient woodland (in existence since the 1600s) as is afforded to historic built assets such as the Derry Walls, built between 1613-1618 particularly as ancient woodland only accounts for 0.08% of the Northern Ireland landscape. - WT feel that the scenic value afforded to areas is too narrow and will fail to fully realise the far reaching benefits of the environment such as providing water filtration, soil protection, carbon storage, improving air quality, flood defences, benefitting biodiversity and wildlife habitats. These need to be recorded in any future planning policy. - Growth Strategy - As ancient woodlands are a scarce resource, statutory protection for the remaining ancient woodland assets in the District must be put in place prior to progressing the growth strategy to ensure a balance between the three strands of the Plan. - Spatial Strategy - Integrate urban green spaces into growth plan to increase the positive impacts of the Preferred Option 3 – Balanced Growth. - Any proposed development should seek to avoid ancient and long established woodland. Development should include green spaces. - Economy - Woodland Trust recognise the need to improve infrastructure in the North West Region but recommend excluding areas of ancient woodland from any proposed routes or sites from major infrastructure projects. - Minerals - Woodland Trust believe Option 2 should be the preferred option. According to the sustainability appraisal. According to the sustainability appraisal Option 3 (seeking to promote mineral development) would have a greater positive impact on Objective 12 – protecting natural resources and enhance biodiversity, and 13 – maintain and enhance character landscape than Option 2 (emphasis on protecting the environment) – There is no evidence offered for this conclusion and common sense would suggest that an emphasis on protecting the environment would have a greater environmental benefits than promoting mineral development in a rural environment. - Option 2 would also have a negative effect on water quality in the short term. - Option 2 is also assessed in the sustainability appraisal as having significant negative impact on enabling sustainable economic growth (5), but only in this sector. There is no consideration given to the positive impact that Option 2 would have on sustainable industries such as tourism. - Economy – Minerals - Woodland Trust do not support assessment of Economy–Minerals:-

		<ul style="list-style-type: none"> - (1)Health and Well-Being – Assessment noted negative impacts upon industry workers health but this was not reflected in the short, medium or long term impacts in the matrix. - (5) Sustainable Growth – assessment only considers negative impact on mineral industry and does not reflect the potential benefit of tourism and outdoor activity industries in rural areas. - (7) Protect physical resources and use sustainably – The assessment of Option 2 does not reflect the ‘significant positive’ impact of this option on the objective- giving it the same level of benefit to protecting the environment as letting the industry continue. It does not recognise the short/medium term life of the mineral industry, and fails to reflect the benefits of this option on more sustainable land uses. - (9) Improve air quality – Assessment fails to reflect the short and medium terms negative impacts of the mineral extraction industry. And also fails to recognise the positive benefits of a long-standing and well maintained natural environment on improving air quality. - (10) Causes and adapt to climate change – Assessment does not recognise the positive benefits of long standing environmental landscapes/green infrastructure of mitigating the causes of and adaptations to climate change through carbon capture, ensuring the integrity of the land and soil in the face of increased weather conditions. - Protect, manage and use water resources sustainably – Assessment recognises that there is less risk to water resources with Option 2 but gives a negative impact in the short-term, while Option 3 which would see a continuation of the industry gives positive impacts for the short, medium and long term impacts on water resources –ignoring the real impacts of the mineral extraction industry on water resources. - Protecting natural resources and enhancing biodiversity – This short, medium and long term significant positive impacts of Option 2 are not reflected in the matrix, with only minor positive benefits noted. This is in conflict to the assessment for option 1 which recognises continuation of the industry would lead to ‘increased fragmentation of habitats, increased risk of pollution and loss of biodiversity’. Surprisingly, a modified continuation of the industry – Option 3 –sees greater positive benefits for protecting natural resources and enhancing biodiversity than Option 2 whose assessment states it would ‘avoid losses to biodiversity and protect the natural environment’. The assessment for Option 3 concludes that the industry will have no negative impacts on the natural environment but in restoration of extraction sites, biodiversity will be enhanced – very obvious conflict here. - Maintain and enhance landscape character – Option 1 for maximizing the sector recognized the significant negative impacts on this objective, however it seems that Option 2 which would prevent growth of the industry thus ensuring the protection of the largest landscape areas only has minor benefits to this objective, while a modified continuation of the industry which would see some landscape areas damaged and changed in the short term is assessed as having significant positive benefits to maintaining and enhancing character landscape, with no recognition of the negative impacts of the industry at any point. <p>Environment</p> <ul style="list-style-type: none"> - The Woodland Trust favours Option 2 rather than preferred Option 1 (Section 9.10) in that it would offer greater protection. - Faughan Valley – one of the richest areas for ancient woodland which was found to be fragmented and under threat. During the past 200 years, The Woodland Trust has secured 180 acres of improved grassland which has been planted in native trees. The vision for the Faughan is for an area of freely accessible native woodland benefitting people and wildlife. - Built Heritage (Section 9.23) - Similarly, The Woodland Trust prefer Option 2 as it would provide positive impacts over and above Councils Preferred Option 1. In the Sustainability Appraisal narrative for Option 2, it talks about the ‘inherent risks in identification of non-designated and therefore not protected, locally significant built heritage. However, nowhere in the Sustainability Appraisal are any of the risks mentioned. - Sending in Supporting Documents – Woodland Trust has provided woodland inventory for the Council area.
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		<p>2 whose assessment states it would ‘avoid losses to biodiversity and protect the natural environment’. The assessment for Option 3 concludes that the industry will have no negative impacts on the natural environment but in restoration of extraction sites, biodiversity will be enhanced – very obvious conflict here.</p> <ul style="list-style-type: none"> - Maintain and enhance landscape character – Option 1 for maximizing the sector recognized the significant negative impacts on this objective, however it seems that Option 2 which would prevent growth of the industry thus ensuring the protection of largest landscape areas only has minor benefits to this objective. While a modified continuation of the industry which would see some landscape areas damaged and changed in the short to medium term is assessed as having significant positive benefits to maintaining and enhancing character landscape, with no recognition of the negative impacts of the industry at any point.
33.	Translink	<ul style="list-style-type: none"> - Agrees with proposed vision for the LDP. - Agrees with the proposed objectives as set out in the POP. - Agrees with the target levels for population growth, additional jobs and new homes in the Growth Strategy. - Overall Spatial Strategy – Figure 7 should indicate the railway line and include it on the index. - Settlement Hierarchy – Further work required for option 3 as the to the compatibility of the selected ‘local towns’ and ‘villages’ with the level of service provided by Ulsterbus which is determined by the extant Service Agreement between DFI and NITHCo. For the provision of Public Transport Services. - Economic Development Land – A re-evaluation of existing zoning is to be welcomed particularly if proper account is taken of the accessibility of individual locations by all modes and how that might change with committed changes to existing transport networks. - City/Town Centres. To make them vibrant there needs to be accessibility by public transport. Strabane would benefit from the pedestrian footbridge between the bus station/depot at Bradley Way and the town centre. - Strabane Town Centre. Translink would support the preferred option if it enables improved connectivity between the Ulsterbus bus station/depot and the town centre. - Local Towns. Reinforcement of the principal bus stops in these town centres would be welcome i.e. adequate kerb space with supporting TROs and/or modern street furniture in terms of bus shelters, lighting, information etc. - Transport. Complementary measures such as strategic Park and Ride facilities now need to be future proofed in the LDP. - Tourism. All new major visitor attractions need to have a mobility plan developed in tandem with appropriate input from Translink. - Rural Economy. Cognisance should be taken of the existing Service Agreement between DFI and NITHCo for the provision of Public Transport Services and the ability of Community Transport in deciding on whether rural sites chosen for development are accessible and sustainable given the threat to budgets. - Strategic Housing Distribution. Housing choice has to be offered but it is important that the locations selected are accessible to existing transport networks and if not planning gain will be required in the form of the provision of mitigating measures and/or financial contributions to support new services/higher frequency of services. - Housing Allocation Quantum. The growth target in the Council’s preferred option should be reviewed every 5 years given the varying economic and social factors that contribute to demand.

		<ul style="list-style-type: none"> - Location and Allocation of Housing Land. No, Translink would wish the Council to undertake a re-evaluation of lands that were zoned for housing to ensure proper account is taken of the accessibility of individual locations by all modes and how that might change with committed changes to existing transport networks. - Open Space, Sports and Recreation. Translink would support the Council’s preferred option to undertake a re-evaluation of lands that were zoned for OSR to ensure proper account is taken of the accessibility of individual locations by all modes and how that might change with committed changes to existing transport networks. - Community Infrastructure. Presently DFI are actively considering reforms to the provision of home to school transport. The out-workings of this exercise will be relevant to the preferred option. - Natural Environment. Option 2 would be more desirable but understandably would need extra resources. - Landscape Character. In supporting option 2, Translink would argue that certain infrastructure works e.g. park and ride sites, by necessity have to be located outside development limits or off-site which may well impact on areas of significant landscape character but still can be accommodated by sympathetic designs. - Coastal development. The forthcoming marine plan for NI should recognise the alignment of NIRs network and given its role in sea defence and Translink’s requirement to undertake maintenance and civil engineering works. - Built Environment/ Heritage. Option 2 would be more desirable but understandably would need extra resources. - Urban Design/Places. Proposed public realm works should more adequately consider the function of affected roads/street during the construction phase. - Renewables. Note the reference paragraph should be 9.38. - Environmentally and people transport friendly transport. The development of pedestrian/cycle networks will be fundamental to the future success of proposed major capital projects such as the NW multi- nodal Hub, new P&R sites etc. - Section 10 Policy Review. It is presumed that the DSCDS approach is being used in other LDPs. - Section 11 Place Making and design vision. DSCDCs development control role will be fundamental to better design and place making in the life of the LDP.
34.	Enagh Youth Forum	<ul style="list-style-type: none"> - Agrees with the proposed vision of the POP. - Agrees with proposed objectives of the POP. - Growth Strategy- need to invest to grow the circular economy in line with the proposed move towards zero waste for the city and region. - Spatial Strategy – The village of Strathfoyle must remain designated as a ‘village’ and requires investment to improve community services, health and well-being and social housing. - Settlement Hierarchy. Strathfoyle must remain designated as a village. - Economic Development – take into full account the findings of the Ben Cave 2015 ‘Health Impact Study’ which was commissioned by the then ‘Derry City Council’ in relation to any further industrial development at Lisahally/Strathfoyle/Maydown. This is extremely important in the interest of protecting public health. All recommendations listed in the report A-O must be fully implemented. Mobuoy Dump must be cleaned up and lessons learned. - Strategic Housing Distribution – consider Strathfoyle as an area for Social Housing Investment. - Housing Allocation Quantum. Consider the provision of rural social housing and Strathfoyle in particular.

		<ul style="list-style-type: none"> - Location and Allocation of Housing Land. There are fields in very close proximity to Strathfoyle that remain zoned for further industrial expansion. Lands zoned for further industrial expansion needs to be re-evaluated given the health impact and homelessness statistics from NIHE. - OSS&R – One major flagship project which must be supported is in the ‘North West Centre For Sport and Well-being at Judges Road Rugby Club. - Community Infrastructure – The Strathfoyle Greenway Project is essential in tackling rural isolation and social exclusion. - Waste – the weakest section of the POP. Council has committed to a zero waste solution and needs to move towards developing the circular economy locally. Eunomia Research has just completed a report for Council on this and it is crucial that you consult with them in relation to any future waste management strategy. - Natural Environment – Protect Prehen Woods Mobuoy Dump needs to be recognised within the POP and the full site needs to be cleaned up in full and lessons learnt. Implement the findings of the Strathfoyle/Maydown Health impact study (Ben Cave associates 2015 commissioned by Derry City Council.
35.	Outer North Neighbourhood Partnership	<ul style="list-style-type: none"> - There is a lack of community infrastructure at Skeoge – green spaces, play parks, pitch development etc. and commercial premises in tandem with the housing developments. - Concerns that H1 lands will be made up of social housing in future. - Private housing taking place in Culmore and the waterside. - Skeoge needs to be more sustainable. - Concerns about the disadvantage and deprivation of social housing in the future. - Policies should support existing District Centres such as Northside which needs regenerated and revitalised. - Pedestrianisation of the walled city should be explored as a transformational tourism/economic initiative for the city and district.
36.	Bryson Energy	<ul style="list-style-type: none"> - Do not support Option 1. - Economic SA or Social/Environmental objectives can be met through the Adoption of Option 1. - While Option 2 may be more attractive from an environmental and social point of view, it doesn’t score well economically, as there are limited optimum sites now remaining for wind farms in the Council Area. - Smaller scale lower output turbines on lower ground not economically viable and would potentially impact on residential/neighbouring amenity. - Solar PV in urban areas rather than in large solar farms in rural areas is not economically viable as it requires lots of smaller installations and more grid connections. - Energy efficiency’ as opposed to the creation of new energy is not referred to in the relevant chapter of the POP.
37.	Inner City Trust	<ul style="list-style-type: none"> - Vision for Derry City Centre. One that captures the rich heritage of the walled city, culturally vibrant with a balance of footfall, tourism, retailing and increased levels of high quality offering. Needs be footfall for retailers, tourism is improved and night time economy. Moving University into city centre should be considered. - Retail capacity of Derry – current and future. Need more niched and bespoke retail. Add capacity in terms of shops, new space however it is hard to see how this is justifiable against low income and employment. Comparison goods and retail warehousing has been detrimental to the vitality of the city.

		<ul style="list-style-type: none"> - How can we improve our city centre? Need a city centre first approach. There should be a masterplan which needs to identify ‘anchor’ footfall. Consideration to public art to complement the Derry walls and other attraction. Needs to be high quality proposals. - Strict adhere to RDS and SPPS city centre approach. - Remove all inappropriate signage on Historic City Conservation Area. - High quality public realm furniture. - City Centre boundary currently defined is adequate. - City Centre boundary does reflect current shopping habit however a masterplan needs to reflect the modern online and niche retail markets. - Most pertinent issue if the architectural and commercial compatibility. Regeneration should incorporate heritage as a key factor – e.g. Bishops Gate Hotel. - Planning Policies are adequate – need stricter enforcement of conditions. - Needs to be a masterplan for wider regeneration and improvement and Ebrington needs to be complimentary to the City Centre. - Vacant site adjoining bus station at Foyle Street ideal for mixed use development. Other sites would be Foyle Bus Station, Ebrington Site and William Street Car Park. - Does not believe that the city centre is well connected. A5 and A6 needs progressed, busy riverside road. Space Syntax should be contacted with regards to movement patterns and spatial layouts in the city. - Overall as part of the Masterplan in the city centre, a new covenant can be created that builds on the strength of each sector within the city that increases regeneration and employment and maintains the character of Derry and at the same time, improves prosperity.
38.	River Faughan Anglers	<p>General Comment - LDP needs to articulate/define what constitutes the ‘public interest’.</p> <p>Section 4 – LDP Vision and Objectives - Economic:</p> <ul style="list-style-type: none"> - Delivery of the A6 (Drumahoe to Maydown) possibly stymied. - The remediation and reuse of Mobuoy Road site needs to be addressed as an integral part of the LDP and should include some form of designation to protect the important riverine landscape. - A5 may be impacted due to sand extraction operation at Victoria Bridge, Strabane which has potential to impact on the economic objective of delivering a strategic roads network, raising concerns around planning and LDP policy proposal for mineral extraction. <p>Settlement Tier Evaluation – Open Countryside</p> <ul style="list-style-type: none"> - This element of the policy considers the potential for dispersed rural communities/housing to be identified in the countryside. It is difficult to justify how PPS21 can be considered to represent ‘sustainable development in the countryside’ given the pressure on resources and services. In particular, concerns arising due to the increased numbers of septic tanks and the impact to the water quality of waterways due to increased phosphorous levels. <p>Mineral Extraction</p> <ul style="list-style-type: none"> - RFA do not support Option 3 on Minerals. In terms of employment and jobs per sector, the minerals industry is not at all significant in terms of the contribution to the local economy. - Many quarries operate outside of modern day environmental standards because of persistent failure of Government to implement the Review of Old Minerals Permissions (ROMPS). - Inadequate minerals policy has been a major problem for many decades failing to protect designated sites including the River Faughan SAC.

		<ul style="list-style-type: none"> - The POP has not acknowledged the policy failure and the review of planning policies section suggests that the planning authority is presently unaware of the true extent of the problem facing the Council in regard to this issue. - Carrying forward a failed Minerals Policy into the LDP is a mistake and an inadequate approach if sustainable planning is to be achieved. <p>Waste</p> <ul style="list-style-type: none"> - Silent on how illegal landfill sites will be dealt with in future. <p>Natural Environment</p> <ul style="list-style-type: none"> - The River Faughan benefits from designations such as Area of High Scenic Value. The River Valley beyond Goshaden/the Oaks is a highly attractive landscape and the AoHSV should be extended along the Faughan Valley in a south easterly direction to connect with the Claudy Country Park in recognition of this. <p>Renewable Energy</p> <ul style="list-style-type: none"> - The POP policy on renewable energy should address the issue of hydroelectric proposals in greater detail. <p>Flooding</p> <ul style="list-style-type: none"> - There appears an apparent contradiction regarding the justification and the Council’s favoured option. The explanatory paragraphs confirm the existence of ‘much certainty’ over the effects of climate change and knock-on uncertainty this might have for the future flooding predictions. Such scientific uncertainty normally invokes a precautionary approach. However, the POP proposes the less stringent of the two, passing this of as a precautionary approach. If Council is proposing a precautionary approach, particularly when Natura 2000 sites are affected and when European Directive 2014/52/EU is applicable, then Option 1 is the true precautionary approach.
39.	RSPB	<p>Section 4: Vision and Objectives</p> <ul style="list-style-type: none"> - Part 4.1 – The vision fails to demonstrate how economic, social and environmental consideration can be integrated to further sustainable development up 2032. - The proposed objectives for the LDP as set out in 4.4 of the POP lack detail and actions to deliver required outcomes and the RSPB could not support the sub-text of each objective as currently proposed. The fundamental principle of sustainable development is that it integrates economic, social and environmental objectives but the LDP does not achieve the requisite level of integration to further sustainable development as the detail beneath each objective, remains primarily within its own pillar silo. - The importance of ecosystem services has not been fully explored and mitigating and adapting to climate change has been omitted from the LDP objectives. <p>Section 5: Growth Strategy – Section 5.4, and specifically the target levels of a) population growth, b), additional jobs, and c) new homes proposed in the Growth Strategy of the LDP</p> <ul style="list-style-type: none"> - Development is not inherently sustainable and only becomes so, if it incorporates environmental and social considerations. Against this backdrop, the RSPB does not support the current aspirations for growth as it is unclear from the document that such aspirations will be set within environmental limits. - Planned development needs to be subject to SEA and informed by a robust evidence base. - No references to environmental capacity or commitments to steer clear of from sensitive areas (habitats and species). - The LDP Growth Strategy must give cognisance needs to be given to eco-system services within and outwith the Council area.

- Climate change poses the greatest threat to birds and aviation is the fastest source of greenhouse gases. RSPB is opposed to providing or expanding existing airports.
 - Difficult to reconcile the sustainable need for growth/numbers of new homes proposed in Option 2 based on figures provided in Table 2.
 - Need for a more restrained growth strategy which could apply the same approach to their preferred Option 2 to Option 1 in that *'if it appears that the target levels are being achieved, at the 5 and 10 year LDP Review stages, the Council will revisit the LDP to ensure that further potential growth in Option 3, can be sustainably accommodated.'*
- Section 6: Spatial Strategy**
- Decisions regarding landuses are made by different organisations and planning should be broad-ranging and integrated with other programmes, plans, policies and projects that affect the development and use of land. Reference should be made to document 'Planning Naturally – Spatial Planning with Nature in Mind: in UK and Beyond' as a key reference point.
 - RSPB is disappointed that no reference has been made to the identification of 'Special Countryside Area'.
 - Should Special Countryside Areas are to be progressed through the LDP, it will be necessary to define what these are and how they will be managed.
 - In terms of '**Settlement Hierarchy**', there has been disproportionate growth in the smaller settlements during the past ten years and if this were to continue, it could affect the role of larger settlements.
 - Caution should be exercised in the approach to growth within smaller settlements, identification of new small settlements and amalgamation of existing settlements which would appear to be contrary to Council policy.
 - The Growth Strategy should steer development to less environmentally sensitive areas.
 - Part 6.3 states that there is an adequate quantum of land within the limits of most settlements.
- Section 7: Economy (7.14)**
- Needs to be a clear distinction between economic growth and sustainable economic growth compatible with social and environmental objectives.
 - Development through development plan needs to be subject to SEA and a robust evidence base.
 - RSPB welcomes commitment in Section 7.12 of the POP to place an emphasis on sustainability and the exploration of brownfield sites.
 - Development needs to respect eco-system services.
 - A need to ensure that economic zonings do not compromise environmental integrity.
 - Clarification on whether Simplified Planning Zones are to be explored.
 - All economic zonings where there are no extant permissions need to be revisited.
- Transport (7.49)**
- Planning can make by a significant contribution to the reducing greenhouse emissions by locating/integrating new development to enable and support the use of public transport provision.
 - The protection of disused transport corridors for future public access in future LDP and promotion of active travel.
 - Need for co-ordinated approach to large infrastructure projects.
 - Any development that is likely to generate 'significant movement' in the rural area and cannot be served by public transport should be refused.
 - Climate change poses the greatest long-term threat to birds.

		<p>Tourism (7.60)</p> <ul style="list-style-type: none"> - Aviation travel should be reduced. - The focus should not only be on tourism infrastructure but protecting but on protecting and enhancing what is attracting the tourists. - LDP proposals should not adversely impact on biodiversity or eco-systems. - Strong protection required for natural and semi-natural habitats which lack formal designation. - Potential disturbance arising from recreational tourism to key birds should also be considered, for example Lough Foyle SPA/Ramsar/ASSI. - Development should be steered clear from sensitive areas. - Option 1 does not sufficiently integrate the requirements. <p>Minerals (7.67)</p> <ul style="list-style-type: none"> - The subject policy needs to be set in the context which ensures that levels of extraction do not exceed environmental limits or undermine the integrity of wider eco-systems. - Mineral sites have the potential to enhance biodiversity sites at the end of their working lives through restoration. - Reference should be made to the RSPB publication ‘Habitats creation for the Minerals Industry’. - Restoration provides recreational and tourism benefits. - Planning permission should be refused for peat extraction from new or extended sites, or renew extant planning permissions. - Potential for sustainable management of peat lands in the Sperrins/Derry and Strabane Border areas. - Development should be steered away from protected sites and policy wording should provide sufficient protection to the natural environment. <p>Rural Economy (7.72)</p> <ul style="list-style-type: none"> - There is minimal reference made to the natural environment within this section or natural heritage which is one of NIs and DCSDCs greatest assets. - A fresh approach is required for future rural economic development locations which is based on sustainability rather than historic patterns of development. - There needs to be a robust policy which protects priority habitats and species as identified in the NI Biodiversity Strategy. - It is questionable how Preferred Option 2 furthers sustainable development and meets the biodiversity duty on public bodies as per Wildlife Order. - While PPS4 is unduly restrictive to rural enterprise, it would be useful to review evidence which supports this concern (Further detail contained in RSPBs response to DOEs call for evidence: ‘Strategic Planning Policy for Development in the Countryside’; attached as further information. <p>Social Development</p> <p>(A) Strategic Housing Distribution (8.7)</p> <ul style="list-style-type: none"> - Refer to Section 6. It is not clear how Option 3 will be in general conformity with the RDS with regards reflection of the settlement hierarchy. - The POP states that there are currently 6,630 vacant homes across Derry and Strabane. - Reinforcing and continuing the existing patterns of growth is not considered sustainable. - Further comment is reserved until further details are known about the distribution allocation for each tier of the hierarchy. <p>(B) Housing Allocation Quantum (8.15)</p> <ul style="list-style-type: none"> - Do not agree with the preferred Option 2 as a robust and sustainable justification for almost doubling the HGI figures last revised in 2016 has not been provided.
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		<ul style="list-style-type: none"> - The POP states that the 'the current commitment figure is significantly in excess of our allocated HGI figure'. It states that it has a general supply of zoned and committed land to cover the Plan period, which raises the issue of site density to be established on such zoned sites, which in turn has implications for the take up of zoned land. - An overprovision of zoned land should not in itself be a justification for the increase in HGI figures, or be the driver for reductions in site densities, both or, which individually and combined could prejudice sustainable forms of development as land is a finite resource which needs to be used sustainably. - New housing development should not compromise environmental integrity. - The need for affordable and social housing is recognised and the tension between delivering housing and safeguarding the environment. <p>Location and Allocation of Housing Land (8.19)</p> <ul style="list-style-type: none"> - RSPB do not agree with the Preferred Option 2 as an overprovision of existing zoned housing land should not in itself be a justification. - Disappointed that Council appears to have almost given up on the site re-evaluation exercise before it has even started the process on account that of the fact that the vast majority of such lands have planning permission. - In order to provide a truly sustainable approach, a robust evaluation must be undertaken to establish the quantum of lands/housing units which are subject to time extant planning permission. - Where developments have been commenced to keep permissions live, consideration should be given to serving Completion Notices on the appropriate owners. - As with all zonings, development, should steer clear from environmentally sensitive areas. - Discrepancy between the narrative for Option 2 as set out as section 8.26 seeks the retention of all committed and zoned housing land, while at Section 8.28, the variation in wording here clearly sets out that it is only committed land which is to be retained. - While DCSDC advocates the use of the sequential approach to land search and identification of sites within two of its options, it is unclear from the POP it is unclear from the POP how it intends to implement such an approach in identification of location and allocation of housing land. - A sequential approach will help further sustainable development. - There should be an emphasis on brownfield land as per 60% set down in RDS. POP lacks ambition in this regard. Consideration needs to be given to brownfield sites which Wildlife/Biodiversity. - Development needs to steer clear of environmentally sensitive areas. - No regard to developing a strategy for rural development in the countryside and recognition should be given to the environmental value of the countryside in LDP policy. - A sustainable approach to dealing with waste water needs to be given priority such as linking dwellings with specially constructed wetlands. - LDP policy as a minimum needs to replicated the wording of SPPS and PPS21 addendum to PPS7. <p>These issues are expanded upon in the call for evidence submission 'Strategic Planning Policy for Development in the Countryside.</p> <p>Open Space, Sport and Recreation</p> <ul style="list-style-type: none"> - RSPB does not agree with Preferred Option 2. - There is insufficient detail with regards to the Councils proposed evaluation of some open spaces to make meaningful comment at that time. - LDP should promote multi-functional green spaces and protect river corridors. - Indoor and intensive outdoor sports facilities should following the existing policy approach of SPPS and PPS8.
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		<ul style="list-style-type: none"> - The LDP should contain proposals for the development of integrated green and blue infrastructure network of green spaces and water features, providing access to amenities for recreation, walking, cycling and wildlife. - RSPB do not accept DCSDCs proposal to only protect suitable and necessary OSR land –this is a significant departure from PPS8 and SPPS. <p>Community Infrastructure (8.40)</p> <ul style="list-style-type: none"> - RSPB does not agree with Preferred Option 1 and consider that all the Options lack ambition in delivering for the health and wellbeing of the Council areas population. - The LDP needs to integrate the three pillars of sustainable development. - Not just about improved provision but also about accessibility. - Refer to ‘Wellbeing through Wildlife’ and ‘Planning for a Healthy Environment’. - Mental health benefits cited. <p>Waste 8.45</p> <ul style="list-style-type: none"> - RSPB strongly advocates a sustainable approach to waste management by reducing the amount of waste being sent to landfill while ensuring there are no environmental risks associated with waste management, disposal or treatment. - There is no reason why the existing policy approach cannot accommodate the policy provisions of PPS21 as amended by the SPPS. - Council should apply a precautionary approach to all waste management proposals. - Disposal of inert waste should be steered clear of sensitive site. - Water and Waste Water Infrastructure – WWTW should be an important consideration in the identification of future development lands. - SUDs should be promoted in the LDP. <p>Environment (Section 9)</p> <ul style="list-style-type: none"> - Plan-making should seek to integrate the three pillars of sustainable development rather than balancing which could result in trade-offs. - POP doesn’t go far enough to further sustainable development. - Eco-systems have not been fully explored. - RSPB disappointed that natural environment is one of the final matters to be discussed in the POP. - All three options fall short in recognising the protection and enhancement the environment. - Option 3 could not happen in reality as other pieces of legislation and environmental assessment could preclude the accommodation of development in other location. - As a minimum DCSDC are requested to combine Options 1 and 2 to provide more recognition and protection. - Not clear how Option 1 will be implemented. - DCSDC must adopt a more strategic approach to protecting and enhancing the environment. - Full recognition must also be given to the natural environment outside of designated areas. - Should DCSDC identify areas of constraint, it is important that any area outside must not become a ‘sink hole’ for development. - Strategic approach should form part of a NI wide spatial approach to wind energy development – an approach which the RSPB has been advocating for some time. Attached copy of DOE call for evidence on Renewable Energy and response to DOE on Strategic Planning Policy for Development in Countryside. - Any Special Countryside Areas should be clearly defined and include ASSIS/SPA/Ramsar designations at Lough Foyle. The RDS and SPPS needs to be taken account of.
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- Natural Heritage Policy Wording - Potential zonings in the LDP should have full regard to natural heritage.
 - Ecological networks should be promoted.
 - Policy on natural heritage should include restoration and enhancement.
 - Reference should be made to 'The Making Space for Nature' Report.
 - International Designations – Buffer zones around designated sites should be considered for inclusion and the current provisions of PPPS 2 carried across in full into the LDP.
 - National Designations - Buffer zones around designated sites should be considered for inclusion in the interests of creating a hinterland into which nature can expand and the current provisions of PPPS 2 carried across in full into the LDP to include AONB.
 - RSPB advocates that the LDP must afford protection to local designations such as SLNCIs and the current provisions of PPPS 2 should be carried across in full into the LDP.
 - Other Habitats, Species or Features of Natural Heritage Importance – Existing PPS 2 should be adopted in full as it provides an important 'catch all'.
- Landscape Character (9.11)**
- RSPB welcome a pressure analysis as proposed in Option 2 which would identify areas of sensitivity.
 - Areas of constraint should not be solely concerned with the visual aspects of capacity.
 - Lough Foyle polders is not only important for Lough Foyle SPA and 5% of breeding population of Lapwings but could include opportunities for public access/interpretation, visitor engagement.
 - Potential also exists within peatland habitats in the Sperrins and Border areas.
- Coastal Development – (9.18)**
- Coastal management needs to be addressed within the LDP. It is suggested by defaulting to the Marine Policy Statement and Marine Spatial Plan, there is an area of our coast from the high water mark upwards which has been omitted by adopting such an approach. Coastal management needs to be addressed within the LDP.
- Built Heritage (9.23)**
- None of the options has regard to protecting the biodiversity of old places as old buildings provide safe refuges for our wildlife.
- Urban Design/Places (9.28)**
- RSPB does not agree with preferred option.
 - Urban biodiversity is declining.
 - No regard given to the importance of quality design in delivering and furthering sustainable development, including biodiversity.
 - POP fails to recognise that good design can promote biodiversity and encourage wildlife.
 - LDP advocates that Council should adopt the principles outlined within the RSPBs good practice guidance for green infrastructure and biodiversity. Key measures included in POP response.
 - Important to recognise wildlife value of brownfield sites when formulating policy.
 - Development should steer clear of sensitive areas.
 - Little evidence on how LDP proposes to use urban design to mitigate and adapt for climate change.
 - LDP should aim to deliver zero carbon buildings. Attention drawn to Kingsbrook development in England and project objectives around wildlife/biodiversity.

		<p>Renewables (9.36)</p> <ul style="list-style-type: none"> - RSPB welcomes the preferred option but it should be extended to include species and habitats. - LDP should promote delivery of a planned and integrated renewable energy generation supply. - RSPB supportive of renewable forms of energy provided they are sustainable and not damaging to wildlife. - Strategic spatial approach to renewable energy development bring proposed by Midulster is welcomed by RSPB. However, this should be done at a regional level in order to be effective. This is set out in attached submission as part of call of evidence by DOE in regard to SPPS for Renewable Energy Development. - Technologies can be located with lowest risk for sensitive species and habitats and design energy policy so that UK can meet emissions targets while having minimum impact on biodiversity. <p>Renewables (9.36)</p> <ul style="list-style-type: none"> - Recommended that wording as per para. 6.224 of the SPPS be transferred into any new policy wording (p.51 of response). - Robust policy required for active peat lands. - LDP should list areas considered sensitive to wind energy developments and cute their nature conservation designations. - Cumulative impact of single turbines will require further attention. - No evidence of a decline in the numbers of single turbine applications; 7. Recommended that wording as per para. 6.224 of the SPPS be transferred into any new policy wording (p.51 of response). - Robust policy required for active peat lands. - LDP should list areas considered sensitive to wind energy developments and cute their nature conservation designations. - Cumulative impact of single turbines will require further attention. - No evidence of a decline in the numbers of single turbine applications. <p>Flooding (9.41)</p> <ul style="list-style-type: none"> - RSPB do not support Preferred Option. - RSPB do not support the permission of new development in areas known to be at risk of flooding or that may increase the risk of flooding elsewhere. - Natural floodplains and watercourses should not be subjected to development pressure and should therefore be retained and restored as a form of flood alleviation and important environmental and social resource. - RSPB advocates an integrated approach to river and coastal management which steps away from defence and drainage and instead looks to contribute to the wider social, economic and environmental objectives set by Government. - A Flood Risk Strategy should be developed and articulated in policy at local level. - Fluvial Floodplains - should be presumption against development within river floodplains. - Flood Risk Assessment requirement and more accurate definition of the extent of potential flooding required. - RSPB content for this policy to remain within LDP.
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		<ul style="list-style-type: none"> - The importance of peat lands for their capacity to store water should be reflected in the assessment of plans to extract peat from lowlands and raised bogs in NI. - Artificial Modification of Watercourses - RSPB support a general presumption against culverting and canalisation of watercourses. - Development in proximity reservoirs - RSPB recommends the retention of the Regional Strategic Policy contained within the SPPS on this matter. - SUDS - SUDS should be promoted within new developments along with retrofits. Revised Draft Consultation on PPS15 attached for information. <p>Environment and People - (9.56)</p> <ul style="list-style-type: none"> - RSPB agree with preferred option. - A strategic approach to developing sustainable transport networks is required as opposed to a piecemeal approach through developers and individual applications. <p>Planning Policy Statements</p> <ul style="list-style-type: none"> - Level of detail with regards to changes to policy wording is insufficient to make insufficient comment/assessment with regards the options chosen for each of the policy areas. RSPB reserve the right make comment when further detail is available. - Calls for evidence provided on Strategic Planning Policy for Renewable Energy Development (6th May 2016); Strategic Planning Policy Statement in the Countryside (May 2016); Strategic Planning Policy Statement for Northern Ireland (Draft) and Revised Draft Planning Policy Statement 15 Consultation response (January 2014) received for consideration as part of POP response. <p>Environment and People - (9.56)</p> <ul style="list-style-type: none"> - RSPB agree with preferred option. - A strategic approach to developing sustainable transport networks is required as opposed to a piecemeal approach through developers and individual applications. - Planning Policy Statements. - Level of detail with regards to changes to policy wording is insufficient to make insufficient comment/assessment with regards the options chosen for each of the policy areas. RSPB reserve the right make comment when further detail is available. - HRA assessment timescale needs to be clarified. - The full suite of Environmental Assessments should be used as tools to minimise environmental impacts. - Ensure next iteration of LDP could provide details of other designated sites which either abut or are linked (e.g. hydrologically) or are in close proximity to DCSDC boundary. -
40.	Retail NI	<p>Part 4 – LDP Vision and Objections</p> <p>Economy</p> <ul style="list-style-type: none"> - The creation of 15, 000 jobs is ambitious and there is no detailed breakdown of which sectors or industries will provide for new employment. - Business ‘Start-Ups’ and ‘Homeworking’ are crucial in contributing to rural economies and policies need to be suitably tailored to support small scale enterprise. - ‘Knowledge Based’ industries need to be located close to the City Centre, Fort George and Ebrington.

		<ul style="list-style-type: none"> - The City Centre needs to be the catalyst for regeneration given its role and connectivity. Social - Focus needs to be on the City Centre as the Gateway for the North-West. - The need to protect and consolidate the role of towns and villages is endorsed. The provision of local centres and services reduces the need to travel and promotes social engagement, particularly for the ageing members of society. - Mixed housing in accessible locations will assist regeneration plans. Larger housing schemes need to include community facilities such as retail, health shared amenities and leisure. Environment - Broad agreement with points raised but states that where a flexible approach is taken to policy making then this would need to be 'robust' and 'grounded' by evidence. Part 5 – Growth Strategy - Major Employment Locations need to be located near to strategic intersections. - Existing developed employment land must be given strong protection to avoid it being lost to other inappropriate development uses. Part 6 - Spatial Strategy - Option 1 which places a focus on Derry City as the Regional City and Strabane as the main hub is the preferred option. Part 7 – Economy - Reservations in respect of the release of any employment lands for any other uses and specifically for retailing or mixed use development outside of any designated centres. - Examination of why existing sites have not been developed needs to occur and barriers to development identified ensuring an ample supply of land in the right locations. - While Preferred Option 3 provides flexibility, growth should be focused in Derry and Strabane. - Employment growth needs to be assessed as part of the monitoring process as well as the phasing of new floor-space and sequential approach applied to existing vacant floor-space and other committed developments. - Smaller and older sites may be more suitable as potential redevelopment opportunities for alternative uses and considered on a site specific basis. B – City/Town Centres 'Generally' - A full 'Glossary of Terms' needs to be included as part of the Local Plan Policies providing a tool for defining and interpreting new forms of retailing and retail centres over the plan period. - There is no need to alter the hierarchy of centres as per DAP 2011 and these should be retained. - A diverse range of uses will be key to the continued success of existing City and Town Centres with regular health checks to ensure better responsiveness to reductions in footfall and vacancy. - The introduction of commercial leisure developments, arts and restaurants in town centres will encourage people to stay after the traditional 5pm close. - The regeneration of existing buildings and previously developed land, enables a review of the amount, size and location of future units to align with retailer needs.
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		<ul style="list-style-type: none"> - Flexibility must be applied in the consolidation of all sequentially preferable site and large mixed use schemes should be disaggregated to avoid out of centre locations. - Retail NI supports Preferred Option 2. C – Retailing Capacity - The existing District Centres in both the Waterside and Cityside have headroom in respect of unimplemented planning permissions and account would need to be taken of these in respect of future retail growth, capacity and need. - The PAC Report into Drumahoe (2012/C005) stated in paragraph 3.24 that regard should be taken of commitments at Northside, Crescent Link and Rosstown Road. - In both the Drumahoe Report and the previous Buncrana Road Report (2013/A0055) it has also been acknowledged that Lisnagelvin District Centre has an extant permission for redevelopment and Springtown has an unoccupied extension and an additional consent for convenience floorspace. It would therefore be apparent that there is an oversupply of convenience floorspace in the City. <ul style="list-style-type: none"> - Retail NI endorses Option 3 and the approach in Paragraph 7.25. D – Derry City Centre - A mixture of uses will attract greater footfall and encourage linked trip and less travel. - Retail Capacity Study should consider the potential for linking vacant units in order to attract multi-nationals. - City and Town Centre sites need to consider redevelopment opportunity site in response to edge-of-town and out-of-town development. - Retail NIO supports Preferred Option 1. E – Strabane Town Centre - The ‘Three Rivers’ Project on Lifford Road is speculative, contrary to Policy, and in the Flood Plain. It should never have been approved by the Minister and detracts from the town centre. - Retail NI supports Preferred Option 1. F- Local Town - Retail NI supports Preferred Option 1. G – Transport - An implement approach to development and transport needs to be implemented with an emphasis on active travel i.e. walking and bicycle. H – Tourism - Plan needs to provide for a sufficient range of hotel and bed space accommodation with future hotel developments being located close to transport hubs. - The Plan should place an emphasis on culture, arts, live music and sports. - Retail NI is supportive of Preferred Option 1. I – Minerals - Retail NI supports Option 3 with mineral development in sustainable locations with an emphasis on protecting the environment. J – Rural Economy - Blanca needs to be struck between providing appropriate development and protecting the countryside with reuse of buildings promoted; - Retail NI supports Option 2. Part 8 – Social Development
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		<ul style="list-style-type: none"> - Need to calculate the number of houses in the Council area over the Plan period in line with HGI which provides an indicative guide. - The supply of zoned housing land needs to be kept under review. - Retail NI agree that Council should consider policies and mechanisms to deliver balanced communities and meet housing need/demand. <p>Part 9 – Environment</p> <ul style="list-style-type: none"> - Plan needs to provide adequate protection to existing sensitive areas and identify new areas for protection. - Plan needs to place an emphasis on design. - A realistic approach needs to be adopted with historic and listed building to allow greater flexibility to bring them back into use. <p>Part 10 – Review of Planning Policies</p> <ul style="list-style-type: none"> - Retain policies but account needs to be taken of outcomes of DfI review of SPPS – Development in the Countryside and Renewables Energy. - SPPS is silent on petrol filling stations. - The proposed review seeks to provide more opportunities in the countryside. - Is there a fundamental need for Council to review the policies or formulate its own policies in the same way other Councils have done in their POP? <p>Part 11 – Settlement – Place-Making and Design Vision</p> <ul style="list-style-type: none"> - Emphasis on Place-making and design will result in a quality built environment. - The regeneration along the banks of the Foyle and expansion of Magee will revitalize the City. Plan needs to encourage active redevelopment of Ebrington, Fort George and Harbour Square.
41.	Cycle Derry	<ul style="list-style-type: none"> - Supports the broad vision however the lack of a genuine focus on sustainable transport within the plan results in it failing to deliver against 2 of those 3 themes (environmental and social). - Environmental – fails to include a sufficiently clear or firm commitment to securing modal shift through strengthening and broadening the appeal of public transport, walking and cycling. - Nowhere does the plan reference or incorporate into the Council’s thinking the internationally recognised hierarchy for road transport – this is a key omission. The plan instead meekly accepts car-dominance as a fait accompli and in some cases even advocates options which entrench it. Despite occasional references to cycling and active travel within the document, it does not put them at the heart of the strategy. It will therefore fail to secure significant modal shift. - Social – the plan fails to acknowledge the positive impact that transport choices can have upon people’s health and wellbeing. The LDP fails to meet its own stated aim of delivering equality of opportunity for all. There should be a clear commitment to making Derry a cycling city. - Specific comments about Health and Well-being; context, council requirement and the cycling opportunity. - Specific comments about equality of opportunity – council requirement. - Specific comments about land use and place making – Planning decision have resulted in a city dominated by cars and have failed to encourage sustainability and connectedness when it comes to the location of commercial facilities e.g. Culmore and Crescent Link. - The Council’s preferred option is to not hold a review of land already zoned for housing. - City and Town Centres – enabling further development of out of town sites in the city can only result in a negative sustainability result. There should be a strict city/town centre first approach – disagree with option A.

		<ul style="list-style-type: none"> - Transport – there should be a clear recognition within the LDP of the need for a comprehensive network of segregated road-side routes on the city’s main arterial routes. White paint on the side of the road is not enough. A2 needs designed to take account of pedestrians and cyclists. - Location and allocation of housing development land. Prefer option 3 – review all current zoning and de-zone any land which does not allow sustainable development and not option 2 just because of previous out dated decisions. - Social and affordable housing and balanced communities. This clear segregation is hard wiring social division into our city. The LDP should acknowledge this phenomena and include policies to oppose it. - Environmentally people friendly transport – in a car dominated city, how can a developer genuinely encourage non-car based usage in any development. - Cycling – need a segregated cycling network. Need a feasibility study into railway line extensions and new stations within the council area. The LDP currently contains no desire whatsoever to see Derry’s existing rail network enhance and expanded. - Place making and design visions – settlements. - We believe the council should instead show leadership and seek to implement a substantial positive step change in how people can and do travel into and around the city. Council should introduce a Sustainable Transport score for areas across the District according to their current provision of public transport and active travel infrastructure. If there is a desire to expand in areas with a low sustainable transport score then that should be done with a parallel improvement in sustainable transport in those areas.
42.	Invest in the West	<ul style="list-style-type: none"> - Transport – Concerned that the POP provides no signs of reversing the dominance of the private car with no mention of rail as being a means of achieving the social, environmental and economic objectives of the Plan. - Feels that POP does not seek to make cycling a genuine transport option through safe and segregated infrastructure. - New Settlements – Rail improvements across the District would expand peoples transport options and new sustainable housing areas alongside. For example, new railway stations at City of Derry Airport, Eglinton and Strathfoyle for existing and potentially new communities. Also, the reinstatement of a rail line from Derry to Strabane should be explored which would connect its two main population centres. Additionally a new rail link between Derry and Letterkenny should be explored with Donegal County Council utilizing the third bridge proposal to the south of the city centre.
43.	Glenmornan Community Association	<ul style="list-style-type: none"> - Agrees with the proposed vision as set out in section 4.1. - Agrees with the proposed objectives as set out in section 4.4 of the POP. - Overall Spatial Strategy – welcome the commitment from DCSDC to balanced growth across the District, especially given that after city dwellers, countryside dwellers make up the largest population grouping. - Settlement Hierarchy –The Council has not proposed how it intends to spatially drive balanced growth across the District while failing to designate/re-designate the Sperrins in line with previous strategies/redesignate the Sperrins in line with previous strategies. Glenmornan needs to be re-designated as a village. Without identifying those settlements which may be upgraded/downgrade, it is not possible to know whether ‘considering’ enhanced development opportunities in the remoter rural areas is a good enough commitment from DCSDS when responding to spatial growth needs. - Waste. DCSDC need to make allowances for those identified new sites within the LDP which were not identified as part of the previous two LDPs.

		<ul style="list-style-type: none"> - Rural Proofing. Welcome DCSDCs commitment to Rural Proofing and the practical outworkings and benefits this will bring to the large rural area and statistically significant rural population of the District.
44.	NI Environmental Link	<ul style="list-style-type: none"> - Climate Change - Councils can play a lead role in the promotion and management of Sustainable drainage schemes (SuDs). - Environment and Economy – A more holistic approach to economic prosperity is required through the promotion of heritage as a mainstream economic driver, the adoption of circular economy principles, and the establishment of a Natural Capital Asset Index. - Environment and Health – The natural environment provides opportunities for improving physical and mental wellbeing. - NIEL would like to see the full implementation of the NI Outdoor Recreation Plan. - This Historic Environment – Cultural assets such as the historic environment and heritage provide a unique opportunity to harness community-led regeneration and enable resilient and sustainable societies. - The Plan should outline how the Council intends to engage and collaborate with other councils and Central Government on locally important issues which have regional significance. For example, climate adaptation or Natural Capital Accounting.
45.	TC Town Planning – on behalf of Theresa Cassidy	<ul style="list-style-type: none"> - Land to be included within the limits of Strabane. De-zone land not committed in Strabane. Land North East of no 44 Glen Road which will meet RDS and SPPS. - Strabane is a tourism gateway. Strabane has potential to go northwards and eastwards for housing. - Economic Development - the southern and western portions of Strabane would lend itself more naturally for this type of land use. The northern and eastern for housing and local amenity facilities. Would not be prudent to focus zoned land in Derry and Strabane – would go against economic development and entrepreneurial opportunities for the countryside. - There should be flexibility for rural business where there is site specific – prefer Option 2. - Council should embrace its existing renewable energy industry with the view to increasing productivity where appropriate, especially where these features are now established in the landscape. It may prove worthwhile that all existing renewable sites could be identified as preference sites where appropriate renewable energy developments are proposed while still protecting sensitive landscape locations.
46.	Inaltus	<ul style="list-style-type: none"> - Comments on legislative and policy matters regarding the SPPS and District Centres. It is noted that the plan is required to have a District Centre having regard to the scale and function of an area. District Centres don't have their boundaries defined. The Lisnagelvin Centre is functioning as a District Centre for the waterside. The POP provides no commentary on the significance or important role that Lisnagelvin for the City. - Would like to comment on the Retail capacity study when it is published as part of the ongoing Plan Process. Retail hierarchy and retail capacity are matters that are of a strategic nature that should be considered at this point in the process. What is happening with the vacant Lisnagelvin Leisure Centre land. The area around Lisnagelvin is a key opportunity to support shopping in the Waterside that should be considered in the new LDP. - City and Town Centres Generally. It is not appropriate for the council to select option 2 over option 3 in terms of designations and policies to promote and protect any District and Local Centres in the absence of a detailed capacity statement. Constraining boundaries of designated Centres with too few development opportunity sites will cause a tension between 'in centre' and 'out of centre' development opportunity site will undermine the ability of the Plan to deliver its growth targets.

		<ul style="list-style-type: none"> - Retail Capacity Options. Only when the Council set out its ambitions for the role of the City Centre can decisions be made about whether the surround shopping centres or complement the City. The city retailing offer is not of a regional scale that might attract shoppers from around NI, Ireland and beyond. With Brexit and potential development of the A5, Derry City needs to take bold steps to achieve retail growth by focusing its retail offer on high order comparison retailing like Victoria Square in Belfast and allow convenience shopping to be built elsewhere in the City in areas where the local population have easy access to it.
47.	Paul McGarvey on behalf of James McDermott	<ul style="list-style-type: none"> - Support the preferred option to encourage appropriate rural businesses to develop in a controlled manner to help sustain the rural economy. - We therefore submit an expression of Interest in the lands highlighted on map (enclosed) Lands are east of industry along Heather Road and could act as a complimentary buffer to the established land use. It is more appropriate to allow new rural business land to be zoned adjacent to existing facilities, rather than have them allocated randomly all over the countryside.
48.	ACA Architecture	<ul style="list-style-type: none"> - Map showing land to remain within Clady Settlement limit.
49.	Inaltus on behalf of Kennedy Retail Park, Strabane	<ul style="list-style-type: none"> - Kennedy Retail Park in Strabane should be given District Centre Status and should be supported and enhanced. The POP does not appear to suggest the designation of any new District Centre or Local Centres. - Strabane needs to have ambition to deliver retail, consistent with its status as the second largest town. Retail Hierarchy and retail capacity are matters that are of a strategic nature that should be considered at this point in the process. - Kennedy Retail would like to work with the Council during the plan process. The Council needs to have bold and ambitious policies to promote growth in retail development. To include constrained retailing policies would contradict the growth objectives and undermine the Council's ability to meet its ambitious targets. - It is not appropriate for the council to select option 2 over option 3 in terms of designations and policies to promote and protect any District and Local Centres in the absence of a detailed capacity statement. Constraining boundaries of designated Centres with too few development opportunity sites will cause a tension between 'in centre' and 'out of centre' development opportunity site will undermine the ability of the Plan to deliver its growth targets. There needs to be more retailing evidence to consider retailing provision. The Location of Kennedy Retail Park is the right location for a District Centre in Strabane – close to town centre. Agree to restrict the town centre by flooding issues. Another issue not addressed in the POP is what designation should the retailing at Melmount Road have – this should be identified as a District Centre to complement the function of the town centre and this should be addressed at the next stage of the process.
50.	Paul McGarvey Architect on behalf of Dairmuid Gallagher	<ul style="list-style-type: none"> - Map enclosed to show lands to be considered as a showground/agricultural shows at lands adjacent to Letterkenny Road.

51.	Paul McGarvey	<ul style="list-style-type: none"> - Main concerns are rural expansion and pedestrian priority with the City wall. Interim rural proofing – there should be no additional rural settlements to these shown on Figure 7 (pages 48 and 49). Mentioned Tamnaherin, Craighbane and Gortnessy. The introduction of expansion and urban streetscape would be totally destructive. - Section 6 – Spatial Strategy – Derry should introduce a one way traffic system or better still introduce pedestrianisation with limited vehicular access (deliveries, disabled). - Section 7 – Economy. Isolated development must be avoided – opportunities will probably be limited anyway due to the nature of rural road infrastructure. Do not widen rural roads to facilitate business traffic.
52.	Paul McGarvey for landowners	<ul style="list-style-type: none"> - Proposed future Crematorium facility – expression of interest by several landowners (adjacent to Killea Village).
53.	AQB	<ul style="list-style-type: none"> - Spatial Strategy. The proposed growth figures are too restrictive. - Section 4 .4 of POP: Embrace positivity too many box ticking exercise that are pointless. - Growth Strategy: Limits to the growth strategy needs to be removed – encourage growth and positive action. - Spatial Strategy: Planning needs to be simplified particularly for small part time farmers – revert back to PPS21 CTY 10. Allow farms let on Conacre to obtain dwellings. - Housing Allocation Quantum: Placing restrictions on housing numbers only serves to restrict development opportunities and in turn push up land values and ultimately house prices. - Location and Allocation of Housing Land. Retain committed and zoned housing land for residential, re-evaluate uncommitted sites and allocate any further required land in accordance with sequential test in SPPS, and deliverability (preferred option). Planning has not reached the stage where it has become too complicated without delivering real results. Uncomplicate planning and get on with real development.
54.	Strategic Planning on behalf of John Black	<ul style="list-style-type: none"> - Housing Growth over the new plan period Prefer option 3 over option 2 as this more accurately reflects an ambitious growth plan for the council and is more in line with previous HGI figures. - Allocation of housing growth – the Council does not clearly identify what or where the referenced ‘other opportunities for development in other settlements’ are. This option 3 cannot be relied on to deliver the amount of growth anticipated for the Council area. Option 2 will provide for proportionate growth across all the settlements and countryside, reflecting each settlement’s existing status and will ensure appropriate growth for each settlement. According to the role it plays in the District. The Council have failed to provide any indication of potential growth for each District. This exercise would allow some indication and clarity to developers and landowners in relation to where potential growth could take place and where there is a need for development land. - Settlement Hierarchy. Nixon’s Corner should be reclassified as a village and expand the settlement to accommodate growth and provision of services associated with a village. - Site specific Map enclosed – Proposed site for inclusion with the settlement of Nixon’s Corner.
55.	TSA Planning	<ul style="list-style-type: none"> - Agree with the vision and objectives of the POP - Economic Development Land. A comprehensive review of existing sites with a view to de-zoning unsuitable lands and zoning better placed sites will be beneficial in the long term, particularly with brownfield industrial sites being allowed for alternative uses such as housing as they may not be viable for continued industrial use.

- City/Town Centres. This option presents an alternative approach in that it protects existing centres and allows for the expansion of District Centres and outer/arterial routes. It is noted that option 3 scored positively across a range of aspects within the **Sustainability appraisal**, but scored negatively on the managing of material assets within the Sustainability Appraisal, but scored negatively on the managing of material assests and could potentially lead to a loss of greenfield land. It is therefore not reasonable to score this negatively in this context and option 3 should be promoted over option 2.
- **Retailing Capacity.** Option 2 presents an alternative approach aimed at maximising the investment opportunities and letting market forces determine the amount of retailing across the District. The Sustainability Appraisal of Option 2 is considered socially neutral and negative for economic and environmental objectives. It is difficult to see why this is the case when it maximises investment potential.
- **Derry City Centre.** Contend that the 'Central Area' and 'Commercial Core' definitions should be replaced and the entire Central Area should be uniformly known as 'City Centre' removing restrictive policies such as Primary Retail Core and Frontages. Whilst these policies seek to strengthen the retail role by concentrating on a location, this can be seen as counterproductive, by restricting other viable uses unnecessarily. There should be equality of opportunity throughout the city centre.
- Strabane **Town Centre.** Bringing in the land closer to the border which already has planning permission will strengthen the role of Strabane as a strategic cross border location connected with Lifford. Longer term this will benefit the economic prosperity of Strabane.
- **Housing Allocation Quantum.** To base any housing growth on the latest HGI figures which did not go through a consultation exercise or public scrutiny is likely to lead to a shortfall in housing land and stymie economic growth across the region. The generous provision of land (i.e. greater than the HGI figures on the website is necessary. To adhere to the actual published figures with RDS 2035 will help properly achieve the objectives of the RDS.
- **Location and allocation of Housing Land.** The tying up of land which is unlikely to be forthcoming for development needs to be addressed. This will afford the opportunity for other lands to be brought into the zoning allocation and stimulate economic activity.
- **Social/Affordable Housing and Balanced Communities.** A social housing requirement can adversely impact on development going forward e.g. of no need exists, what are other mechanisms for addressing this requirement? Too robust a policy will skew balance of any controversial discussions in favour of Housing Association as a 'ransom' for permission. Option 2 is preferable.
- **Community Infrastructure.** The bringing forward of committed sites only will ensure no land is unnecessarily tied up and will also help inform the wider LDP Strategy. Wording should however be included that will give favourable consideration for health and education proposals on other lands and to also allow alternative uses to come forward on the zoned lands should the relevant authority confirm they don't intend to bring forward for the identified purpose and/or they are surplus to requirement.
- **Waste.** Suitably worded policy should permit necessary infrastructure to come forward on alternative sites, if required and zoned lands to be disposed of for other uses if no longer being brought forward by the relevant authority.
- **Natural Environment Landscape Character.** The Sperrins AONB is a valuable resource that should be afforded protection form inappropriate development. Applications for development should be accompanied by a suitable Landscape analysis to demonstrate that they do not do harm.
- Urban Design/Places. This would meet the policy requirements of good design within the SPPS.

56.	Seamus Canavan on behalf of DW Consulting Ltd	<ul style="list-style-type: none"> - The LDP and the POP should not unfairly prejudice windfarm applications currently in the system. Disagree with options on energy and landscape character as they are prohibitive. This could result in wind energy applications which could impact on the ability to meet renewable energy targets and also impact on local economic growth and less diverse rural economies.
57.	Fleming Mountstephen Planning on behalf of Henderson Group	<ul style="list-style-type: none"> - The LDP needs a planning framework which is supportive of modern, Local Convenience, locally accessible shopping and should be encouraged in the LDP. The LDP should encourage appropriate flexibility to accommodate modern petrol forecourts and local shopping facilities on main roads and it should be recognised that such facilities will more often than not be beyond the boundaries of designated centres. It is also noted that local conveniences plays an important role in targeting social need, sustains local communities, improves equality of access to local retail services and reduces the need to travel. - The RDS, SPPS and LDP. There should be positive policies for local shops of a scale appropriate to the sector and will help to deliver the RDS commitments and is consistent with the five sore principles of the SPPS. - Local shopping in rural settlements is also apparent in the NI Rural Development Programme. - Section 7 of the POP – Economy. City/Town Centres – there should be a balanced provision for local shopping facilities. - Retailing Capacity – the issue of qualitative as well as quantative need is important including competition and choice and flexibility. - Derry City Centre – option noted. - Strabane Town Centre – option noted. - Local Towns. Provision outside of town centre boundaries for local shopping in designated centres. - There should be appropriate provision in villages and small settlements.
58.	TSA Planning on behalf of Genova NW Ltd	<ul style="list-style-type: none"> - Agree with proposed vision for LDP. - Agree with the proposed objectives for the LDP. - Economic Development Land. A Comprehensive review of existing sites with a view to de-zoning unsuitable lands and zoning better placed sites will be beneficial in the long term, particularly with brownfield industrial sites being allowed for alternative uses such as housing as they may not be viable for continued industrial use. - City/Town Centres. This option presents an alternative approach in that protects existing centres and allows for expansion of District Centres and outer/arterial routes. It is noted that option 3 scored positively across a range of aspects within SA, but scored negatively on the managing of material assets and could potentially lead to a loss of greenfield land. It is therefore not reasonable to score this negatively in this context and option 3 should be promoted over option 2. - Derry City Centre. We would contend that the ‘Central Area’ and ‘Commercial Core’ definitions should be replaced and the entire Central Area should be uniformly known as ‘City centre’, removing restrictive policies such as Primary Retail Cores and Frontages. Whilst these policies seek to strengthen the retail role by concentrating on a location, this can be seen as counterproductive, by restricting other viable uses unnecessarily. There should be equality of opportunity throughout the city centre. - Strabane Town Centre. Bringing in the land closer to the border which already has planning permission will strengthen the role of Strabane as a strategic cross border location connected with Lifford. Longer term this will benefit the economic prosperity of Strabane. - Housing Allocation Quantum. To base any housing growth on the latest HGI figures which did not go through a consultation exercise or public scrutiny is likely to lead to a shortfall in housing land and stymie economic growth across the region.

		<ul style="list-style-type: none"> - Location and Allocation of Housing land. The tying up of land which is unlikely to be forthcoming for development needs to be addressed. This will afford the opportunity for other lands to be brought into the zoning allocation and stimulate economic activity. - Social/Affordable Housing and balanced communities. A social housing requirement can adversely impact on development going forward e.g if no need exists what are other mechanisms for addressing this requirement> Too robust a policy will skew balance of any controversial discussions in favour of housing association as a ‘ransom’ for permission. Option 2 is preferable. - Community Infrastructure. The bringing forward of committed sites only will ensure no land is unnecessarily tied up and will also help inform the wider LDP strategy. Wording should however be included that will give favourable consideration for health and education proposals on other lands and to also allow alternative uses to come forward on the zoned lands should the relevant authorities confirm they don’t intend to bring them forward for the identified purpose and/or they are surplus to requirement. - Waste. As above, a suitably worded policy should permit necessary infrastructure to come forward on alternative sites, if required, and zoned land to be disposed of for other uses if no longer being brought forward by the relevant authority. - Landscape Character. The Sperrins AONB is a valuable resource that should be afforded protection from inappropriate development. Applications for development should be accompanied by a suitable Landscape Analysis to demonstrate they do not harm. - Urban Design/Places. This would meet the policy requirements of good design within the SPPS. - Crescent Link, Derry. Retail Hierarchy needs re-assessed. Category b – Option 3 and Category C, Option 2 preferable as it is to be more investment friendly.
59.	MBA Planning for Riveridge Recycling	<ul style="list-style-type: none"> - Map enclosed showing proposed regional waste management site at junction of Maydown and Electra Road. Rezone land/RiverRidge as a regional waste management facility – justification provided.
60.	MBA Planning	<ul style="list-style-type: none"> - This response relates to Economy Issues B, C, D and G and Environment Issue G. - There is overlap between economy issues B and C. - Option 1 of Issues B and C would constrain new retail development. It would deprive the District residents of modern new shopping facilities and would have a detrimental impact on the local economy. - Options 2 and 3 of Issue B both support existing centres. Options 2 provides for limited development in District Centres whilst Option 3 would allow for more growth in District Centres and arterial sites. - Option 2 of Issue 3 would allow retail growth generally, whilst Option 3 would monitor capacity and permit phased growth. - No definition provided on what constitutes a ‘District Centre’. - Bunrana Road around the vicinity of Lidl is consistent with being a DC. - Derry City Centre – Agree with Option 1 of issue D insofar as the terminology used in the new LDP should be consistent with the SPPS. It should refer to ‘City Centre’ and ‘Primary Retail Core’. - Derry City Centre – Food supermarkets rely on adequate car-parking. The LDP should acknowledge that sites within DCC may not be suitable for food supermarkets. - In relation to Economy Issue G – Transport – MKA agree with Option 1.

61.	Mark Houston Design on behalf of Niall Devine, N&R Group	<ul style="list-style-type: none"> - Map enclosed showing land between Woodland Close and Corrody Road to be included within settlement limits.
62.	Rock Architecture	<ul style="list-style-type: none"> - Expand Town Centre Boundary in Strabane. Option 3 – 7.37 Strabane Town Centre. Option 3 is a formalising of the existing and approved future development of the town centre. To maintain and restrict the town centre boundary as in option 1 is to turn Strabane’s back on the border. To concentrate development on the gap sites and vacant units will not affect the economy of the town centre. Enlarging the town centre provides the opportunity to attract new development of varying size, scale and nature and will create the demand for the rejuvenation of the traditional core.
63.	Mary Kerrigan Consulting	<ul style="list-style-type: none"> - Section 4 – Vision and Objectives. Request that the vision is written in the present tense as if it already exists. - Economic Objectives – need a local circular economy with local independents, walkable neighbourhoods, accessible in urban and rural areas as well as home working and self-employment. Prioritise sustainable modes of transport, upgrade of rail line. Cross border, cross cultural, cross generational community building. Built heritage – unique walled core. - Social Objectives – physically integrated interconnected residential land. Countryside – sustainable, restrict new builds if work in settlement. New homes after using existing land. New homes – mixed tenure, distinctive, connected communities. Housing – repair, remake, create terraced residential street. Community facilities in high streets including living over shops. - Environment Objectives. Achieve biodiversity, high quality architecture, urban design, conservation and landscape architecture, strengths of existing urban, heritage assets, natural heritage, interconnected physical environment, squares, parks. Sustainable power, zero waste, maximise modes of transport, reduce travel times. - Growth Strategy. Targets sets at option 1 but no more than the lowest level of option 2. Reduce number of new builds – mapping exercise required. - Spatial Strategy – prefer option 2 – rationalise upper tiers. - Economic development land – favour option 3 with the following added. If over supply rezone greenfield land back to agricultural use. Economic development within existing gap sites. - City centres. Favour option 1 – minimise urban sprawl. Shopping centres not be designated as high streets. - Retailing capacity favour monitor retail capacity, reduction in retail capacity. Return office/retail use to residential/compatible use. - Derry City Centre – favour option 1 – range of mixed use and residential among these. - Strabane Town Centre – favour maintain existing town centre boundary – need a detailed re-evaluation of boundaries. - Local Towns – retain compact town centre boundary. - Transport – not in favour of either option. More rail, cycling, walking. - Tourism – city/town areas as tourist destinations as whole. - Rural Economy focus rural economic development in towns and villages is far more sustainable as a whole. - Strategic Housing Distribution. Option 2 is the most sustainable. - Housing allocation quantum. Favour RDS 6,500 dwelling current HGI. Focus on existing land not new build.

		<ul style="list-style-type: none"> - Location and allocation of housing land – only carry forward zoning seemed sustainable. Concerns about social housing on edge of city – creating ghettos of the future. - Social and affordable housing and balanced communities – prefer option 1 - Open space, sports and recreation – prefer option 2. Create parks shared by surrounding neighbourhoods. - Community Infrastructure. Do not favour any of the three options. Instead integrate community infrastructure into existing neighbourhoods within high street typology. - Natural Environment – prefer option 2. - Landscape Character – prefer option 2. - Coastal development – ensure highest design and sustainability standards are achieved. - Built environment/heritage. In addition to option 1, designate new areas/buildings of historic importance and preclude all development likely to adversely impact on such sites/buildings on their settings. Protect collective unlisted built heritage (including boundary wall) through local listing processes now available to council – especially in inner city/town areas. - Urban Design/Places. Prefer preferred option. Include high quality design of spaces: street, squares, parks, riverside walkways and their enclosing buildings. - Renewables. Preferred option 2 – identify the most sensitive landscape zones remaining, for protection, permitting appropriate wind and solar development elsewhere in line with SPPS. Add tidal power. - Flooding – avoid all further development in flood prone areas, or those forms of development which exacerbate flooding elsewhere. - Environmentally and people friendly transport – identify encourage require pedestrian accesses/footways, cycle paths, bridal paths and other green/blue proposals. - Section 1 PPS 3 to favour the creation of street typology routes as opposed to roads. Amend PPS12. PPS12 allow for other uses within residential developments – live/work units, business workshops etc. PPS21 – retain largely unchanged. Proposed amendments e.g. CTY2a clustering, farm clustering and dilution of the 6 and 10 year criteria seem to widen the door to suburbia in the countryside – a dilution of a natural asset. - Section 11 Place making and design vision. Include inner town/city and ‘walled city’ surrounding contexts among the places needing regeneration as well as major regeneration sites. Needs to be pro-active proposing urban design led master plans where necessary.
64.	Bond Architects	<ul style="list-style-type: none"> - Settlement Hierarchy. Request that Gortnessy be brought within the small settlement designation. If not it is in danger of becoming marginalised rather than a balanced mixed community. - Rural Economy. The control here should be on a case by case basis with a presumption to approve unless shown to be harmful. The equality of the proposal should be the deciding factor. - Strategic housing distribution – there should be opportunities across the settlement tiers. - Housing allocation quantum – in the past existing planning approval not used have been used (sic) to limit new applications and strict limits need to be enforced. If a planning approval for multiple housing is no used within two years alternative application should be considered. - Landscape Character Option – design quality should be a determining factor.
	Canavan Associates on	<ul style="list-style-type: none"> - Does not want the LDP to unfairly prejudice the work to date carried out for the proposed turbines at Bolaght Mountain. - Section 9 Environment issues and options. Natural Environment – option 1 preferred option.

65.	behalf of R McLaughlin, L McLaughlin, N McKeague & S Morgan	<ul style="list-style-type: none"> - Landscape Character – option 1 preferred option. - Built Environment/Heritage – option 1 preferred option. - Renewables – wind and solar – option 1 is preferred option. Don't agree with option 2. - The prohibitive nature of the POP options could result in a reduction wind energy applications which could impact on the ability to meet renewable energy targets and also impact on local economic growth and less diverse rural economies. - Economy – the District Council has low economic activity rates and high deprivation. The first economic objective of the POP is the creation of jobs and prosperity. Support of wind energy development's economic benefit should translate into stronger support for these POP policy objectives.
66.	Lee Kennedy on behalf of McCormick Builders Ltd	<ul style="list-style-type: none"> - Section 4 – Vision and objectives – Social development objectives are extended to include the designated/zoning/provision of lands. Housing need for Strabane and smaller settlements. The zoning will already need to take account of lands required for the infrastructure upgrade of existing transportation routes and services. Developers have found sufficient problems trying to access backland developments through land ownership problems. This concern needs to be given preference in the new LDP. - Growth Strategy – agree with option 2. After review periods additional lands can be incorporated to meet the potential growth of the city and district as a whole. The potential growth of the university and the potential significant increase in student numbers and need for accommodation over the plan period should be addressed at this stage and incorporated into the plan for the District.
67.	Lee Kennedy on behalf of Messers McGlinchy, McDuff and McDaid	<ul style="list-style-type: none"> - Section 4 – Vision and Objectives. Agrees with the aims but requests that the social development objectives are extended to include the designated zoning/provision of lands within the settlement limit to accommodate the overwhelming social housing need of the city. - Agree with Growth Strategy – option 2. After review periods additional lands can be incorporated to meet the potential growth of the city and district. Potential growth of the university and the potential significant increase in student numbers and need for accommodation should be addressed at this stage. Land at Springtown Road – to be included within development limit – map enclosed.
68.	Brendan Johns on behalf of Mr G Sayers	<ul style="list-style-type: none"> - Map enclosed showing Lands situated between Evish Road and Fountain Street/Sprout Road, Strabane to be included within the Strabane Development limits. 70ha of land within one ownership would allow the Council to phase development and extend the limits to suit the demands and needs. Future development will not compromise the environment, visual amenity or landscape quality, proximity to the town centre, unsuitable for industrial development as it is not in proximity to the main arterial routes, can accommodate further residential traffic, easy access to the Sperrins AONB, close to service infrastructure, residential is a logical extension, retention of natural boundaries, not within any natural or built heritage designations.
69.	MKA Planning on behalf of Mr and Mrs Paddy Cosgrove	<ul style="list-style-type: none"> - Map enclosed showing land to be included within Derry Settlement Limit at 56 Beragh Hill Road.

70.	MKA Planning on behalf of Kevin Watson	<ul style="list-style-type: none"> - Map enclosed – lands at Ervey Road, Tamnaherin to be included within settlement limits. Housing Monitor – There is little land left for housing in Tamnaherin. There is a new primary school in Tamnaherin and a sewage treatment works with additional capacity at Tamnaherin for development. Land submitted is a natural expansion. It is an important service centre for the surrounding rural area. Natural infilling of existing built development. - Rural Housing Allocation – a greater allocation of land should be allocated for rural housing in the new local Development Plan. - Social Housing Need – There is significant unmet social housing need in Eglinton and Lettershandoney. Tamnaherin can meet this need. Eglinton has 47 households and Lettershandoney has 14 households in housing stress.
71.	JPE Planning on behalf of BW Homes and Construction Ltd and Braidwater Ltd	<ul style="list-style-type: none"> - Agree with LDP Vision. - Agree with proposed objectives. - Overall spatial strategy. BW Homes/Braidwater are in general agreement to focus the growth on the upper tiers, whilst also providing sustainable growth across the towns and villages. - Transport. B/W Homes/Braidwater note the feasibility study undertaken by DFI to end the A5 around the west of Derry City. The company agrees this would provide infrastructure improvements to enhance the circulation around the city and provide strong cross board connection. - Sections 1-3 District Profile, Policy Context. Welcomes Plan functions set out in paragraph 1.8 in particular to facilitate sustained growth, allocate land and plan led framework. Agree with policy context in section 3 but to have regard to the draft programme for Government around Brexit issues which needs explored. - Section 4 Vision and Objectives. Would encourage the council to engage with NIHE and housing associations to ensure that their respective funding arrangements will work within the plan policies. - Section 5 – Growth Strategy. Agree with plans to extend the resident populations of Derry and the NW region. Supportive of option and more in favour of option 1. Strongly agree that sufficient flexibility needs to ensure the optimum potential be reached. Need realistic growth rather than over provision that undermine viability. The upper limit of 160k population could be surpassed within the plan period if the Council’s capital projects programme is successfully delivered which would have implication for the planned housing growth and as such BW/Braidwater strongly encourage the council to tie in early and regular fixed review stages. BW/Braidwater would agree that the plan must provide for the upper requirement of at least 12,000 home in terms of spatial land supply but be cognisant of the previous HGI figure of 16,000 homes. BW/Braidwater would urge the council to ensure sufficient land is zoned to enable the delivery of these home which requires a buffer of over-provision to satisfy this projected growth in the plan. Also need delivery and choice to achieve social and private housing. - Social Development. Housing Growth Plan – general agreement but would urge council to ensure sufficient housing supply. Need to have regard to current building rates and ensure this is not wrapped up in total provision. - Location and allocation of housing land. Committed sites should be retained in addition to new land. The western edge of Derry around the Creggan area is the most suitable land which is closer to employment centres. - Social affordable housing and balanced communities. Can’t agree to option 1 without further research in this area. Opposed to any key site requirements of site specific obligations as this could sterilise land or may not actually result in the delivery of social housing. Whilst a general policy for the plan to consider the need/demand on an application by application basis may be acceptable there is insufficient research to qualify at this stage.

72.	David Dalzell	<ul style="list-style-type: none"> - Spatial Strategy – section 6. Agrees with preferred option. There should be detailed consideration of the needs of Drumahoe as a secondary nodal point and a mini hub as it strategically occupies the eastern approach to the city. - Settlement Hierarchy. The LDP should recognise and address the special importance of the village centre of Drumahoe. - Economy – section 7. Land should be zoned for Industry and or economic use in Drumahoe. The field to the south of the existing Chambers site should be zoned to allow for expansion. There is capacity to create modern, purpose built smaller units in the extensive plots around these factories. The LDP should be flexible enough to allow these start-ups and enterprises, and not restrict their establishment by tight zonings and policies simply because they do not fit the traditional ‘industrial’ mould. Some retail may also be permissible, especially in association with workshop units where products are made and sold on site etc. - City/town centres generally. The POP does not mention Drumahoe Village. The LDP should be flexibility to facilitate the continued improvement and development of this retail site, and could curtail its viability by over-restrictive ‘town centre first’ polices. - Retailing Capacity. The LDP must consider Drumahoe Village to be an existing retailing node and recognise the value and potential this area has to cater for local catchments and the wider rural area. - Transport. It is expected that the dualling of the A6 from Dungiven to Drumahoe will commence in 2019 and be complete in 2022. This presents a unique opportunitites to locate facilities for local people and visitors at nodal points on the new road. - Tourism. Policies contained within PPS16 have generally worked well. The facilities for tourism in the LDP area are inadequate in number and quality to attract and retain visitors in the area especially in the rural area. There is no mention in the POP of the growing caravan/motor home and ‘glamping’ sector which should be actively encouraged. The vision of the LPD should not be limited to flagship sites or tourism zones. - Minerals. The mineral resource in the LDP should be protected from inappropriate development that would limit or event prevent extraction in the short, medium or long term. Older workings can be restored in conjunction with new extraction proposals, as necessary tied to planning agreements and conditions. There should be a general presumption in favour of mineral development in favour of mineral development properly done with a full restoration package. - Rural Economy. Mineral extraction is generally a rural based operation and an important employer in the rural area of the LDP. - Social Development (Section 8). Waste. The North West region has a recognised shortfall in provision for landfill, especially for inert waste. The DAP 2011 did not address the issue. A suitable site for landfill is Lisbunny Quarry on the Longland Road, south west of Claudy Village. - Natural Environment. Appropriate development has the potential to enhance the natural environment through active investment in restoration and management, without which the designated site could become unmaintained and degraded. Each proposal should be on its merits. - Landscape Character. The Landscape Character Assessments are by their nature, a broad guide to the general characteristics and sensitivities of the LDP area, and are useful as such but limited in scope. They are not site specific and it is not possible at this stage, to identify each development that may emerge during the plan period. - Built Environment/Heritage. Appropriate has the potential to ensure the ongoing viability and survival of historic buildings and environments. Each proposal should be treated on its merits, but policy should encourage development which will have a positive effect in helping to maintain the viability and viability of these places. - Planning Policy Statements Section 10. Positive policies that encourage a wide range of tourism schemes as contained in PPS16, especially the caravan motor home and camping sector which is under represented in the LDP area should be carried through and expanded.
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73.	Futurescape Planning	<ul style="list-style-type: none"> - Miscellaneous Welcome and support the proposed functions of the LDP in paragraph 1.8 with the exception of last bullet point which implies the Community plan has already been produced. - Misc. The NISRA population projection falls 3 years short in covering increased population for the whole of the plan period and the population projection should be well in excess of 15 years. - Misc. Section 2 fails to examine social housing projections for the whole plan period and clearly there is an underestimation of social housing need for the new local development plan. - Misc. Section 2 is silent on the subject of Brexit. The population projections must factor in Brexit. - Vision and Objectives. Social development objectives (iv). The provision of 12,000 is too conservative and fails to adequately cover the whole LDP plan period from expected adoption. The 15 year plan period should at least commence from the adopted date allowing for some usual delay. There is an omission in the evidence on population implications and changing movement patterns post Brexit. - Section 5 Growth Strategy. Disagree with Council's preferred option 2. Option 3 is the preferred option although still conservative. All three options are modest and the 2016 HGIs does not give a true projection as they are based on completion rate from 2010-2015 when completion rates were very low due to major recession and the lack of available housing land in up to date plans. There also appears to be a lack of evidence to support the three options. A more in depth housing market analysis should be explored to gauge housing projections. 10% contingency would be a reasonable approach for housing land. - Section 8 – social development. Location and allocation of housing land. All land should be re-evaluated as part of this new plan process. Little land remains undeveloped with Strabane and the natural place to direct growth is towards the south where the River Foyle could act as a buffer separating the town from the countryside. - Site specific Lands identified to the south of Strabane. - Agrees with vision and objectives of the LDP. - Overall spatial strategy – welcome the identification as Strabane as a main town, sitting higher in the settlement hierarchy above other towns in the Council area. - Settlement Hierarchy. Agree there should be rationalisation of upper tiers with five tiers in the hierarchy. However Sion Mills should be re-classified as a village and Claudy should remain a village leaving Castlederg and Newtownhamilton as the only two local towns within the Council area. The suggestion to raise the status of Sion Mills from a village to a local town could have a negative impact on Strabane which is only a few miles away. - Strategic Housing Distribution. The focus should be on directing growth to Derry and Strabane to ensure they maintain their status in the settlement hierarchy to accord with the RDS. - Housing Allocation Quantum. 16,000 dwelling is still considered quite modest as only considers up to 2032 and fails to allocate a 5 year additional land supply or introduce a contingency if some sites are never built. - Community Infrastructure required for the entire plan period should be identified in the plan and considered as part of furthering sustainable development alongside housing and jobs.
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74.	Strategic Planning on behalf of Mr JP McGinnis	<ul style="list-style-type: none"> - Housing Growth. Propose that the Council adopt option 3 to recognise the commitments to strengthen and enhance the North West Region. Option 3 is more in keeping with previous HGI projections of 18,000 new dwellings being required in the district by 2025. - Allocation of future housing growth. The Council does not identify in option 3 for the allocation of housing growth ‘other opportunities for development in other settlements’. Therefore the growth of all settlement (excluding Derry and Strabane) is uncertain and this option cannot be relied upon to deliver the amount of growth anticipated for the Council area. Suggest option 2 proportionate growth is a better option. The Council have failed to provide any indication of potential growth for each settlement within the District. A brief exercise has been undertaken to consider the potential growth required at Eglinton to sustain its current functionality as a village. - Settlement Hierarchy – propose that Eglinton should be upgraded into a local town. - Map enclosed showing Coolfiney Road, Eglinton. Proposed site to be enclosed with limits. Housing Growth over the new plan period. Allocation of future housing growth. Settlement Hierarchy.
75.	Strategic Planning on behalf of Mr John Killen and Mr Clarke Killen	<ul style="list-style-type: none"> - Housing Growth. Propose that the Council adopt option 3 to recognise the commitments to strengthen and enhance the North West Region. - Allocation of future housing growth. The Council does not identify in option 3 for the allocation of housing growth ‘other opportunities for development in other settlements’. Therefore the growth of all settlement (excluding Derry and Strabane) is uncertain and this option cannot be relied upon to deliver the amount of growth anticipated for the Council area. Suggest option 2 proportionate growth is a better option. The Council have failed to provide any indication of potential growth for each settlement within the District. - Potential sites for inclusion within the settlement limits of Campsey – 3 sites shown on enclosed maps.
76.	Strategic Planning on behalf of Mr Derek McFeely	<ul style="list-style-type: none"> - Housing Growth. Propose that the Council adopt option 3 to recognise the commitments to strengthen and enhance the North West Region. Option 3 is more in keeping with previous HGI projections of 18,000 new dwellings being required in the district by 2025. - Allocation of future housing growth. The Council fail to clearly state the amount of housing allocation that will be allocated to Derry and the other settlements and therefore option 3 should not be relied upon to deliver the growth required. Option 2 is a better option. Council need to undertake an exercise to assess whether existing zoning land is capable of delivering development. - Client has 7.76ha of land that is ‘development ready’ on the south east of Derry.
77.	Strategic Planning on behalf of Mr Gerard Heaney	<ul style="list-style-type: none"> - Housing Growth. Propose that the Council adopt option 3 to recognise the commitments to strengthen and enhance the North West Region. Option 3 is more in keeping with previous HGI projections of 18,000 new dwellings being required in the district by 2025. - Allocation of future housing growth. The Council does not identify in option 3 for the allocation of housing growth ‘other opportunities for development in other settlements’. Therefore the growth of all settlement (excluding Derry and Strabane) is uncertain and this option cannot be relied upon to deliver the amount of growth anticipated for the Council area. Suggest option 2 proportionate growth is a better option. The Council have failed to provide any indication of potential growth for each settlement within the District. A brief exercise has been undertaken to consider the potential growth required at Eglinton to sustain its current functionality as a village. - Settlement Hierarchy. The re-designation of Eglinton as a local town will further increase the need for additional development land at Eglinton as set out in the preceding section. - Site one – map enclosed. NE of Eglinton along the Ballygudden Road – include in limits. Site 2 – east of Eglinton along Killylane Road – include in Settlement limit. Housing Growth – disagree with option. Allocation of housing Growth – disagree with option.

78.	Strategic Planning on behalf of Londonderry Port and Harbour Commission	<ul style="list-style-type: none"> - Vision and Objectives – supportive of overarching economic objective of creating jobs and promoting prosperity. - Strategic Planning are preparing a Development Framework Plan for the wider port area to inform future development and growth in the area and are keen to engage with the Council on it. - Page 37, 7.8 of the POP. Many of the current businesses and operators within the wider port area fall within the sectors and markets identified in 7.8 and would encourage the council to consider the wider port area as being suitable to accommodate these sectors and request the LDP reflects the need to accommodate further suitable and sustainable economic growth in the wider port area. - Encourage the council to pursue policies and designations in the LDP that will enhance the port’s role as a key cross border and international gateway. Would suggest that the objective is broadened to include Donegal County Council rather than just Letterkenny. - Growth Strategy. Council should be more ambitious in its growth strategy – prefer option 3. While some businesses may view Brexit as a challenge or threat the Port is in a position to capitalise on new emerging markets and trade arrangements and the LDP should aim to respond to this and provide for such opportunities rather than set an overly cautious framework for future growth. - Economy options. Agrees with option 3 in terms of economic development Land. The lack of demand or desire to develop industrial/employment land is due to the zonings being in the wrong locations and/or the zonings lacking any policy direction in terms of appropriate or acceptable uses. The Council need to ensure the port is identified as an area suitable for sustainable economic development. - As part of the re-evaluation of zoned industrial/employment land, we would encourage the Council to consider the creation of some accompanying guidance for new zonings that provides some direction regarding appropriate development types and land-uses, without overly restricting development potential in such zonings. - Agree that there is ample economic land and that existing lands needs to be reviewed to ensure it is adequate and appropriately located. - The Council should consider a unique zoning/designation for the port area. - Transport – agree with the Council’s option 1 to maximise opportunities for sustainable development arising from the A5/A6 and A2 upgrades.
79.	Strategic Planning on behalf of Mr Black	<ul style="list-style-type: none"> - Housing Growth. Propose that the Council adopt option 3 to recognise the commitments to strengthen and enhance the North West Region. Option 3 is more in keeping with previous HGI projections of 18,000 new dwellings being required in the district by 2025. - Allocation of future housing growth. The Council does not identify in option 3 for the allocation of housing growth ‘other opportunities for development in other settlements’. Therefore the growth of all settlement (excluding Derry and Strabane) is uncertain and this option cannot be relied upon to deliver the amount of growth anticipated for the Council area. Suggest option 2 proportionate growth is a better option. Other councils have published their POPs and included potential growth for each settlement within the district. Urge the Council to undertake a similar exercise to provide some clarity to developers and landowners in relation to where potential growth could take place and where there is a need for development land. - Settlement Hierarchy. Nixon’s Corner is classified as a small settlement. Welcome the upgrade of Nixon’ Corner from a small settlement to a village. As such there will be a need to expand the settlement to accommodate growth and provision of services associated with a village. - Site specific. Proposed site for inclusion within settlement limits of Nixon’s Corner. Approx. 1.66ha to the north west of the settlement with access through Crevagh Park.

80.	Turley Associates on behalf of Dalradian Gold Ltd.	<ul style="list-style-type: none"> - Dalradian have concerns with regards to the process and content of the SA Scoping Report. In summary these are: no outline of the comments received from the consultation body and subsequent amendments to the SA based on the recommendations made. This prevents consultees and interested parties from making further comments which is not in accordance with DP Practice Note and recognised best practice. - Appears to be very limited transboundary consultation with adjoining councils which would have provided additional baseline information. - The baseline information within the scoping report fails to convey the key messages from within the Council’s own evidence base documents and recognise the potential for significant gold reserves within DC&SDC and the substantial benefits that minerals extraction could have on the local economy where these physical resources are extracted in a sustainable manner. Sustainability Comments Concerns. Minerals Policy. - Comments re Baseline Paper – statistics – need to obtain better evidence. Section 10 – PPS. PSRNI on minerals paper.
81.	Turley Associates on behalf of Consortium of Landowners Investors, Developers and Investors re Housing	<ul style="list-style-type: none"> - Evidence Based Critique. Turley commissioned an evidence based critique of Growth and Spatial Strategy within the POP. The assessment considers the evidence underpinning the growth and spatial strategy and provides recommendations for the improvement of the evidence base to inform the next iteration of the Local Development Plan. A full report including modelling outputs will be available in due course. The assessment provides an up to date evidence based analysis of the key drivers of growth and in particular the associated need for housing in the district of Derry and Strabane over the plan period. It is critical that the LDP from this early stage is built from a robust evidence base which provides a solid foundation to support and justify its stated ambitious vision and objectives. It is noted that in deriving the assumed growth levels the Council has drawn upon datasets which do not appear to have a consistent base date from which levels of growth have been extracted. - Drivers of Growth. The need for demographic projections of need include demographic projections of need, supporting a growing economy, meeting the need for affordable housing. These drives draw upon a review of the latest published evidence and bespoke demographic modelling produced by Edge Analytics using the POPGROUP suite of software. The report provides an evidence bases critique of the underpinning analysis and justification for the selected growth and spatial strategy set out within the POP. - Growth and spatial strategy – evidence based critique submitted. A review of the demographic picture in Derry and Strabane reveals the District has seen relatively modest historic population growth. The longer based 15 year projection which suggests a level of population growth and resultant housing need which broadly aligns with Option 1 in the POP. In order to accommodate even this modest level of job growth, a higher level of housing provision than that indicated by Option 1 will be required. The baseline and higher growth scenarios in this research broadly align with the levels of job growth implied through options 1 and 2 of the POP. - The modelling presented in our report therefore indicates that the preferred (option) 2 to provide 12,000 dwellings or 705 dwellings per annum should be considered as a minimum level of housing provision to be planned for within the emerging LDP. This will ensure that the Council’s economic objectives align with its emerging housing policies and its economic ambitions are not constrained. In summary the scale of growth envisaged under preferred option 2 is supported. It is noted that in the POP this is presented as a range. - Spatial Strategy Settlement Hierarchy Options. Option 3 a balanced growth is considered a reasonable option and Nixon’s Corner, Ardmore, Culmore, Campsie and Eglinton also have string rates of growth and the LDP should continue to ensure this. Whilst the council asserts there is an adequate supply of land across the District, further evidence is required to assess the comparative viability and deliverability of this land. - Settlement Hierarchy – we need to build upon the evidence base of the role and function of the settlements and those smaller ones in the rural area. Need to recognise the rural interrelationship. - Affordable housing. It is important to recognise that the district has historically delivered high levels of housing growth with the average net completion of around 1,400 homes per annum over the period from 1999 to 2013. Whilst the implied levels of growth proposed within the POP

		<p>evidently fall below this historic level, this does serve to reinforce the reasonableness of assuming higher levels of housing delivery could occur where there is evidenced need and demand.</p> <ul style="list-style-type: none"> - Improvement of the evidence base to inform the next iteration of the LDP. Agree with the scale of growth envisaged (option 2). Further evidence required to assess the comparative viability and deliverability of this land. Supports review of all settlements. Finalised report will be released in due course.
82.	Turley Associates on behalf of Mr Gabriel Dolan	<ul style="list-style-type: none"> - Extend the settlement limit of Strabane to include premises and land at Lifford Road. It is part of the historical development of commercial premises at this cross border gateway. Since removal of the security checkpoint and associated structures there has been significant environmental improvement Map enclosed. This space is now at the junction of multiple planned projects including the A5 Western Transport Corridor; N15 upgrade; three rivers project; border greenways project and these all envelope the Dolan premises. This site bounds the three rivers project and it is logical that the town boundary coincides with the new urban footprint defined by the three rivers permission. Recommendation is to extend the settlement limit of Strabane to include premises and land at Lifford Road.
83.	Turley Associates on behalf of Mr Ernie Lusby	<ul style="list-style-type: none"> - Support for Councils' proposed vision and objectives. - Housing Growth Ambition has limitations; Recognise the cautious approach adopted to growth. The Plan should seek to accommodate at least 12,000 dwellings over the plan period or some 705 dwellings per annum as a reasonable level of housing provision in the context of current evidence. - Spatial strategy; Support the spatial strategy where Derry is recognised as the principal city, within the context of a North West Cross Border Region. - Settlement Hierarchy; support the settlement hierarchy, recognising Derry must achieve a 'critical mass' of size. - Settlement Hierarchy – support for balanced growth across the settlement hierarchy – recognising the importance of continued/proportionate growth of all settlements. - Disagree with option to retain all committed and zoned sites – housing land availability. - Developer contributions – flexibility should be maintained to reflect site/development specific circumstances. - Housing Growth Ambition – Limitations of current analysis. Option 2 should be considered as a minimum level of provision to be planned for. - Housing Land Availability – further evidence is required to assess the comparative viability and deliverability of this land. - Affordable housing needs to be considered in the context of the objectives for economic growth. - Retention of existing zones – should be a priority that Council re-evaluate all existing zoned sites given period of time since adoption of the previous Strabane Area Plan Failure to release existing zoned sites places further pressure on supply and impacts on affordability. - Lands at Ardmore suitable for Housing. The extension lands are contiguous with the settlement of Ardmore and is a suitable candidate for proportional growth.
84.	Turley Associates on behalf of parties with an	<ul style="list-style-type: none"> - Bay Road, Derry. The Fort George permission establishes a framework for future investment by defining uses that are complementary to the role of the city centre. Fort George and land at Bay Road could perform a fundamental role in achieving the 'critical mass' targeted by the POP and SGP. It is in strategic location, higher density can be accommodated, waterfront location, has a sense of history, where larger floorplates

	interest in Bay Road	are involved. A comprehensive vision will be required that considers the place that can be shaped here. Planning feasibility analysis at Bay Road at an early stage, the LDP represents a timely opportunity for considering where major economic investment can be accommodated in the City.
85.	Turley Associates on behalf of Mr John Burns	<ul style="list-style-type: none"> - Support for the Council’s settlement strategy. - Support for the proposed vision and objectives (relating to Strabane) in particular the ambition for maximising the economic corridor potential for Strabane and the associated A5 improvement Scheme supporting recognition of Strabane as potentially benefitting from close proximity to Lifford; and supporting the need to enhance transport linkages particularly between Derry Strabane and Donegal. Support the Council’s vision for Strabane and we welcome the formulation of a Regeneration Framework. - Map enclosed – option for lands at Urney Road, Strabane to be included within a revised settlement limit. The site is in an established residential character along Urney Road. It is visually integrated with Carricklee Hill, mature boundaries/wooded areas limit views of the site; A5 WTC will establish a defensible edge to the town; development is confined to lower contours; the land is not subject to flooding or suffers other adverse ground conditions and future strategic access will be provided to the A5 WTC. - Disagrees with Council’s approach to return all committed and zoned lands. - Welcomes the Council’s preference to allow development in flood prone areas as appropriate. - Urge caution in respect of adoption of flat rate development contributions. - Housing growth ambition. Limitations of the current analysis. The options are based upon a manipulation of published datasets which are not inter-related or produced at a common time. There is limited evidence of a full assessment of the inter-relationship between job growth and population growth which takes into account the changing demography of the city and district. - New Demographic model – an independent growth projection commissioned by Turley has assessed the impact of job growth on housing need. The assessment concludes that the preferred level of housing provision in the POP, as set out under Option 2, some 12,000 dwelling (or 705 dwellings per annum should be considered as a minimum level of provision to be planned for within the emerging Plan in order to ensure that the Council’s economic objectives align with its emerging policies for planning for housing provision. - Housing Land Availability. Further evidence is required to assess the comparative viability and deliverability of this land. This requires further consideration of the comparative demand for homes across different parts of the district and the scale of infrastructure provision to facilitate individual sites coming forward over the LDP period. The scale of affordable housing need needs to be considered in the context of the objectives for economic growth. - Retention of existing zonings. It is considered a priority that Council re-evaluate all existing zoned sites given the period of time since adoption of the previous Strabane Area Plan. Whilst numerous sites will have significantly progressed planning proposals others have not. Failure to release existing zoned sites places further pressure on supply and impacts on affordability.
86.	Turley Associates on behalf of Magim Ltd	<ul style="list-style-type: none"> - Supports the Councils Settlement Strategy. - Support for the proposed vision and objectives, particularly around maximising the economic corridor potential for Strabane and the A5, support Strabane benefitting from close proximity to Lifford, and support the need to enhance transport linkages particularly between Derry, Strabane and Donegal. - Disagrees with Council’s approach to return all committed and zoned lands.

		<ul style="list-style-type: none"> - Welcome the Council’s preference to allow development in flood prone areas as appropriate in flood prone areas as appropriate. Urge caution in respect of adoption of flat rate development contributions. - Support the Council’s vision for Strabane and welcome the formulation of a Regeneration Framework. - Housing growth ambition. Limitations of the current analysis. The options are based upon a manipulation of published datasets which are not inter-related or produced at a common time. There is limited evidence of a full assessment of the inter-relationship between job growth and population growth which takes into account the changing demography of the city and district. - New Demographic model – an independent growth projection commissioned by Turley has assessed the impact of job growth on housing need. The assessment concludes that the preferred level of housing provision in the POP, as set out under Option 2, some 12,000 dwelling (or 705 dwellings per annum should be considered as a minimum level of provision to be planned for within the emerging Plan in order to ensure that the Council’s economic objectives align with its emerging policies for planning for housing provision. - Housing Land Availability. Further evidence is required to assess the comparative viability and deliverability of this land. This requires further consideration of the comparative demand for homes across different parts of the district and the scale of infrastructure provision to facilitate individual sites coming forward over the LDP period. The scale of affordable housing needs to be considered in the context of the objectives for economic growth. - Retention of existing zonings. It is considered a priority that Council re-evaluate all existing zoned sites given the period of time since adoption of the previous Strabane Area Plan. Whilst numerous sites will have significantly progressed planning proposals others have not. Failure to release existing zoned sites places further pressure on supply and impacts on affordability. - Housing Development at Bradley Way, Strabane has been identified -map included which is strategically situated at the junction of the Great Northern By-pass and Bradley Way. There is a flood alleviation scheme in place. A policy lacuna resulted in a previous failed planning application to develop the land for housing. Policy exceptions of PPS15 effectively ruled the site out for development despite the land benefitting from the flood protection works. It is a highly sustainable location in close proximity to the town centre to local amenities and to public transport links. There is an already established residential character that this development will complement. It is a technically, environmentally and sustainably sound location for housing. Supporting technical information will be provided in due course. On this basis we request that the land is identified as a confirmed housing zone (rather than whiteland).
87.	<p>Turley Associates on behalf of Hartlands Ltd</p>	<ul style="list-style-type: none"> - Support for the overall policy context as defined in the document. - Support for the Council’s proposed vision and objectives particularly around job creation, capitalising on the role of Derry at a cross border and international gateway and for sustainable (balanced) opportunities. - Recognise the cautious approach adopted to growth. - Support the spatial strategy where Derry is recognised as the principal city within the context of a North West Cross Border Region. - Support for the settlement hierarchy, recognising Derry must achieve a critical mass of size. - Disagrees with Council’s approach to return all committed and zoned lands. - Urge caution in respect of adoption of development contributions, flexibility should be maintained to reflect site/development specific circumstances.

		<ul style="list-style-type: none"> - Housing growth ambition. Limitations of the current analysis. The options are based upon a manipulation of published datasets which are not inter-related or produced at a common time. There is limited evidence of a full assessment of the inter-relationship between job growth and population growth which takes into account the changing demography of the city and district. - New Demographic model – an independent growth projection commissioned by Turley has assessed the impact of job growth on housing need. The assessment concludes that the preferred level of housing provision in the POP, as set out under Option 2, some 12,000 dwelling (or 705 dwellings per annum should be considered as a minimum level of provision to be planned for within the emerging Plan in order to ensure that the Council’s economic objectives align with its emerging policies for planning for housing provision. - Housing Land Availability. Further evidence is required to assess the comparative viability and deliverability of this land. This requires further consideration of the comparative demand for homes across different parts of the district and the scale of infrastructure provision to facilitate individual sites coming forward over the LDP period. The scale of affordable housing need needs to be considered in the context of the objectives for economic growth. - Retention of existing zonings. It is considered a priority that Council re-evaluate all existing zoned sites given the period of time since adoption of the previous Strabane Area Plan. Whilst numerous sites will have significantly progressed planning proposals others have not. Failure to release existing zoned sites places further pressure on supply and impacts on affordability. - Map enclosed – Springtown Road – land suitable for housing to the north and south of Springtown Road. A concept has been developed for the site to test development feasibility with a number of key outcomes (enclosed in letter) Previous consider of lands north of Springtown Road identified that there were no significant visual or environmental grounds to support excluding the lands from the settlement limit. - Evidence confirms that the emerging plan should seek to accommodate at least 12k dwellings and 705 dwellings per annum in order to support the economic growth objectives and therefore additional land will be required of which the lands at Springtown are recommended to be zoned in the emerging plan.
88.	<p>Turley Associates on behalf of Heron Brothers</p>	<ul style="list-style-type: none"> - Agree with Plan Vision and Objectives. Housing objective should focus on suitable sites that makes a meaningful contribution. - Spatial Strategy – agree with option 3 balanced growth approach. - Economic Development. Support Council’s intention to re-evaluate all current economic zonings and rezone/zone new site but need to ask why some existing land has not been developed through engagement with landowners and explore alternative uses. Need to look at viability as this is of uttermost importance to the developer. - Policy PPS4 should be reviewed and look at the develop agreement which may assist in the delivery of an economic development site. - Strategic Housing. Support option 3 for the distribution of housing development across the Council area. - Housing Quantum allocation. Support option 3 instead of option 2. A key driver to meeting economic growth is private housing as well as social housing. - Location and Allocation of Housing Land. Support option 3 rather than option 2. Need to assess unimplemented zonings as well as new housing designations to see if they are suitable, available and viable for residential housing. - Site 1 is located to the north of Beragh Hill Road and east of Lenamore Road, Derry outside of the development limit. - Site 2 is located on the south westerly part of Derry, off Glassagh Road and south of Ballymagowan Gardens for residential development, consist of 46.84 hectares and a yield of between 600-1,200 units and would make a meaningful contribution to the housing allocation. The lands are located in an area of high social need and could make a meaningful contribution to addressing the housing requirements set out in the LDP.

89.	Shauna Cathcart	<ul style="list-style-type: none"> - Growth Strategy - Need to maximise every opportunity to promote the development of the area. Council must adopt Growth Strategy Option 3 which aims to maximise the 'potential optimum of the area as a city region'. - Spatial Strategy – the overall settlement hierarchy must recognise the important role of the ‘Local Towns’. These settlements already have the necessary services, infrastructure and ‘critical mass’ to enable them to cater for their catchment populations. Endorse option 2 of the specifics of the settlement hierarchy. - Economy – encourage option 3. Old unsustainable employment land zonings should be deleted and new sites identified. - Social Development – strategic housing distribution – would support option 3 with a strong emphasis on the Local Towns. Prefer Option 3 Housing Allocation Quantum. - Social development – location and allocation of housing land - there should be a review of housing zonings and unzone some housing lands. Identified a housing test (more detail in letter). - Identified sites which should not be zoned for housing such as sites which would extend the urban area in a linear fashion; development on or near the skyline; sites with no natural limit of development; sites with steep slopes that would require retaining walls. - Adequate play facilities. Skeoge, Culmore, Galliagh, Shantallow and Carnhill lack adequate playing facilities. Some green spaces built on poorly drained blue clay.
90.	Gerald Roarty	<ul style="list-style-type: none"> - Adequate play facilities. Skeoge, Culmore, Galliagh, Shantallow and Carnhill lack adequate playing facilities. Some green spaces built on poorly drained blue clay.
91.	Danny Rafferty	<ul style="list-style-type: none"> - More GAA pitches especially 4G GAA in Greater Shantallow Area.
92.	Mark Foley	<ul style="list-style-type: none"> - Very little mentioned about Gaelic games, facilities and development in the city.
93.	Brian O’Connor	<ul style="list-style-type: none"> - Not enough spaces for GAA activity – two shared spaces that the Council have lack of floodlights and ball catchers.
94.	Colm Duffy	<ul style="list-style-type: none"> - Cycling as a form of transport is lacking – there should be alternative modes of transport. Wants to see specific measures considered and a commitment to increasing the personal mobility percentage for cycling. Vehicular transport is no longer sustainable. - Linking a city cycle network with tourism – huge opportunities to explore in this area.
95.	Darren Currie	<ul style="list-style-type: none"> - Open space, GAA Clubs are non-existent. No 3/4G facilities - need ball catchers. Need to re-evaluate the current Open Space Requirement position in terms of role and function and identify and protect an existing land.
96.	Mary Casey	<ul style="list-style-type: none"> - Economy should be prioritised as sustainable development. - Sustain Vibrant rural economy by providing local planning linked to Council Strategy in a structured partnership programme. - Policy Review – Community Partnership approach to issues identified including a gender policy to investment. New Policy to have integrated planning with Government Commitment. - Education as a suggestion for contributing to the future development of the District.

		<ul style="list-style-type: none"> - Community Infrastructure – Not enough education facilities commensurate with sport. Not enough community centres etc. commensurate with population growth areas. Specific issues include a shared community hub. Also why do ratepayers in the fastest growth settlement in NI have no shared community hub no play area commensurate with population growth? - Shared spaces and transport should be given specific community focus. Halt migration through an integrated strategy matching skills. - Housing in settlement. Need to ensure equality of community services provided in terms of rural/housing balance. Housing growth should be focused on 1. LIOTS, 2. Existing integrated community services provided. 3 Existing population demographics. There is adequate social housing provision and there is a need for a strategy to allow families to be able to get onto owning their own home. Lack of quality product for traveller’s accommodation. - Urban Design and Townscape. Policies should require developers to demonstrate how they have taken account of the Living Places 10 key principles and there should be locally elected representatives accountable. There should be an integrated community planning structure for enhanced design as a minimum requirement. There should be a building height policy to meet identified needs. Lots have not been delivered nor quality public are liked to existing expertise nor public transport integration. There is a need to establish an integrated Council design board. - Transport and Movement. There is a need to link public transport services to population projections and other strategic investment priorities. The current state of affairs is unsustainable. Need to ensure people movement is priorities and there is an integrated public safety system. There is merit in establishing a Government investment scheme. - Town Centres. Establish park and ride routes including Bus. Establish Tourism and Heritage signage. Establish daytime pedestrian zones. Establish an integrated design strategy and operations board. Out of town shopping can be positive when a balanced strategy exists. Untapped evening potential. Parking is an issue in terms of tourism buses. - Tourism – Sustainable attractions to maximise economic growth include Colmcille, The Siege, The Walls, The U-boats surrender and WWII US Intelligence Centre, Amelia Earhart, Women and Shirt making Heritage, River Foyle basin. Need a co-ordinated integrated strategy with operational timescale for cross border – passing through tourism. Artisan markets are emerging tourism, need to establish village and town centres and integrating sustainable communities. There is untapped potential and timely for an integrated partnership structure with operational timescales. - Waste Management – Community Recycling and product innovation programmes; accessibility; community led training including project marketing; schools initiatives; innovation prizes. Need to establish an integrated and innovative strategy with best practice from existing successes. Brexit – no issue since this should be included under social justice. Existing expertise and relevant programmes including the harnessing of creativity should be community based and include in the integrated community plan. - Minerals – Establish a transparent and accountable policy and operational procedures in partnership with the local community. It would have a positive impact and offer potential for improving land use planning and outcomes. Areas of constraint should be in river basins, mountain and settlement areas. Untapped potential with tourism designation. Establish a council design integration strategy board with timescales for outcomes. - Hierarchy of settlements – makes potential for more effective and responsive work. Hierarchy should be village, town and city. All hamlets should be upgraded to village. Data collection and analysis of existing linkages. - Coastal Development. Coastal and its coastal infrastructure and rural marine tourism potential. Culmore coastal walk; investment in safe access and facilities at Culmore; a boardwalk from Culmore to Bay Park as areas to be protected; Establish a community partnership board as Dublin
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		<p>Pont did in the 1990s and on which I was a member along with other neighbouring villages; establish an integrated coastal strategy board with timescales for outcomes.</p> <ul style="list-style-type: none"> - Renewable Energy. Establish an integrated Design Strategy Board with timescales for outcomes. I would like to read the data collected on existing Council based wind turbines wind farms and their role in enhancing benefits for locals. Where can I source the data collected for the Council area. - Open space and Recreation. The existing provision should have programmes for better health outcomes Safe access and facilities provided Community Partnership approach to improved outcomes. Needs to be accessibility and transparency on land use management. The Culmore Football Club leases a water logged field in partnership with Council. Significantly absent with no modern play provision for the population growth. Providing a partnership approach to deliver against identified needs. Council has approved significant housing development with no increase in play provision nor any respect for family support services nor developer contributions. - Sustainability Scoping. Community plans already undertaken submitted to Council not delivered. An emphasis on social housing and not on home ownership. No equality of provision. The Council area is identified as having a low house price, low wage based, high child poverty and not in work population record. There is a need to establish sustainable signature projects to create change.
97.	Padraigin Nimhaonaigh	<ul style="list-style-type: none"> - Needs to be an identified action regarding community provision. Need to look at the major part this plays/needs to play in education and skill and the role for community training organisations.
98.	David Young	<ul style="list-style-type: none"> - Bready – the Council needs to recognise the development potential of local hamlets especially Bready. Its needs a new primary school and availability of sewage infrastructure.
99.	Aidan Devine	<ul style="list-style-type: none"> - Craigtown known as Craig is being ignored as a settlement/village in this plan. There are 2 houses under construction and one house occupied. Concern that the village is being erased from official maps as part of a policy of preventing people living in the Countryside. Craig should be recognised as a Village/settlement in LDP 2032.
100.	Eamon Caldwell	<ul style="list-style-type: none"> - Craigtown known as Craig is being ignored as a settlement/village in this plan. There are 2 houses under construction and one house occupied. Concern that the village is being erased from official maps as part of a policy of preventing people living in the Countryside. Craig should be recognised as a Village/settlement in LDP 2032.
101.	Teresa Donnelly	<ul style="list-style-type: none"> - Craigtown known as Craig is being ignored as a settlement/village in this plan. There are 2 houses under construction and one house occupied. Concern that the village is being erased from official maps as part of a policy of preventing people living in the Countryside. Craig should be recognised as a Village/settlement in LDP 2032.
102.	Gerard Harkin	<ul style="list-style-type: none"> - Craigtown known as Craig is being ignored as a settlement/village in this plan. There are 2 houses under construction and one house occupied. Concern that the village is being erased from official maps as part of a policy of preventing people living in the Countryside. Craig should be recognised as a Village/settlement in LDP 2032.

103.	John Duffy	- Craigtown known as Craig is being ignored as a settlement/village in this plan. There are 2 houses under construction and one house occupied. Concern that the village is being erased from official maps as part of a policy of preventing people living in the Countryside. Craig should be recognised as a Village/settlement in LDP 2032.
104.	Fintan Hughes	- Craigtown known as Craig is being ignored as a settlement/village in this plan. There are 2 houses under construction and one house occupied. Concern that the village is being erased from official maps as part of a policy of preventing people living in the Countryside. Craig should be recognised as a Village/settlement in LDP 2032.
105.	Myles Donnelly	- Craigtown known as Craig is being ignored as a settlement/village in this plan. There are 2 houses under construction and one house occupied. Concern that the village is being erased from official maps as part of a policy of preventing people living in the Countryside. Craig should be recognised as a Village/settlement in LDP 2032.
106.	Michael Donnelly	- Craigtown known as Craig is being ignored as a settlement/village in this plan. There are 2 houses under construction and one house occupied. Concern that the village is being erased from official maps as part of a policy of preventing people living in the Countryside. Craig should be recognised as a Village/settlement in LDP 2032.
107.	Nigel McGillian	- Craigtown known as Craig is being ignored as a settlement/village in this plan. There are 2 houses under construction and one house occupied. Concern that the village is being erased from official maps as part of a policy of preventing people living in the Countryside. Craig should be recognised as a Village/settlement in LDP 2032.
108.	Joe McLaughlin	- Cycling – more should be mentioned about sustainable development for cycling as a method of transport in Derry. This will encourage cycling, commuting and promote good health.
109.	Thomas McCallion	- Lack of facilities and space for cycling in and around the city. There should be an increase in availability of cycling areas – reduce vehicles and improve health.
110.	Peter McCarron	<ul style="list-style-type: none"> - Definition of ‘Sustainable Development’ should be included in LDP. - Chpt 3 Policy context - Supportive of Chpt 3 content. - Chpt4 LDP Vision & Objectives: Economic Objectives – agree with inclusion of people without cars in Point I. - Chpt4 LDP Vision & Objectives: Economic Objectives – disagrees with definition of Point VI - Chpt4 LDP Vision & Objectives: Economic Objectives – Point VI (Eco Obj) could cause conflict with Point IV (Env Obj) - Chpt4 LDP Vision & Objectives: Economic Objectives – sustainability must be incorporated into Point VI. - Social Development Objectives – broadly in agreement. All accommodation should have minimum of two bedrooms to facilitate visits by family and friends. - Environment Objectives – rail should be included in Point IV. - Environment Objectives – Point VI is not an environmental objective. It is economic.

		<ul style="list-style-type: none"> - Chapter 5 Growth Strategy - Section 5.1 – contradiction between stating sustainability is a core concept yet still wanting to indulge in massive road construction. - Chapter 6 – Overall Spatial Distribution – Option 3 is best however development in countryside needs tightly controlled. - Chapter 6 – Overall Spatial Distribution – Specifics of Settlement Hierarchy – agrees with proposals for and seeks an objective evaluation to be undertaken. - Chapter 7 Economy: 7A Economic Development Land – sustainability of the options is called into question. Keen to see re-use of brownfield / derelict sites. Fort George should be zoned for regional stadium and associated development. - Chapter 7 Economy: 7B City & Town Centres: agrees with town centre first approach and seeks more housing in town centres. Requires re-use of old town centre buildings. - Chapter 7 Economy: 7C Retailing Capacity: Option 3 needs tight control. - Chapter 7 Economy: 7D Derry City Centre: needs a proper bookshop in addition to excellent second hand ones. - Chapter 7 Economy: 7F – supports defining of town centres. - Chapter 7 Economy: 7G Transport – should remove active travel from both options. It is well covered in 9H Transport-Environmentally & People Friendly. Should be appraised as a topic in its own right. 2040 ban on fossil fuel engines is not accounted for in the POP. Section 7.55 should point out that the building of such roads is in conflict with 7.49 & 7.50. Transport section needs a third Option to open up discussion on what we really need in in terms of transport to facilitate the movement of people, goods and services. Stresses need for Council not to play down significant effects while playing up benefits. - Chapter 8 Social Development 9A Natural Environment: adopt precautionary approach to designation of protected sites and retention of hedgerows, wetland features and trees. - Chapter 8 Social Development 9D – Built Heritage: prefers option 2 over preferred option 1. - Chapter 8 Social Development 9E Urban Design / Places– supportive of Option 2. - Chapter 8 Social Development 9F Renewables Wind & Solar – areas that use a lot of energy should try to generate their fair share and every suitable roof in council area should have solar panels. - Chapter 8 Social Development 9G Flooding - prefers Option 1 over Option 2. Definitely no more development should be permitted in river floodplains. - Chapter 8 Social Development 9H Transport – make sure footways, cycle paths etc. and associated infrastructure is actually constructed. - Miscellaneous - Derry needs a regional stadium and perfect location is Ft George. Could accommodate offices and retail uses. - Miscellaneous – would also like a velodrome to promote cycling. - Miscellaneous – reinstatement of light railway / tram to Strabane, Omagh and beyond. - Miscellaneous – bus services should be priced to heavily undercut the cost and hassle of driving. - NTS is incomplete. Does not comply with Point 10 of the compliance checklist (Appendix 2 –SA) No information regarding Section 3 ‘Summary of Sustainability Findings’ or Section 4 ‘The Next Steps.’ - Section 1.1 of SA – identifying significant effects of a preferred option. This process has not been carried out correctly in some sections at least. - Some of the preferred options clearly are incompatible with one or more of the objectives e.g. A5WTC. - The cumulative impacts of plans and policies is poorly completed in relation to transport options.
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111.	Andrew Ryan TLT Solicitors on behalf Mr and Mrs Mullan	<ul style="list-style-type: none"> - Section 6 – Spatial Strategy – Settlement Hierarchy. Land in Green Belt on edge of Culmore. Development opportunities lie within the land immediately behind no 132 and 134 Culmore Road (Map enclosed).
112.	Jane Grant	<ul style="list-style-type: none"> - Transport - Low Level bridge option in the 1970s to bring railway across the city into Donegal and provision for a third bridge needs to be kept in mind. - Minerals – no fracking at any time. Homes need spaces for garages. - Strategic Housing Distribution – ensure homes have space for garages especially for electric cars. - Housing Allocation Quantum -Multi-generational living with grandparents etc. - Open Space, Sport and Recreation - Prehen – speed limits, traffic calming, more social provision needed. - Waste – The council needs to take Mubouy seriously. - Urban Design/Places - agree with option. - Renewables – passive homes should be encouraged.
113.	Raymond Kee	<ul style="list-style-type: none"> - Artigarvan – the opportunity to ensure that any new housing development is situated on the west of Artigarvan must be addressed.
114.	Colm Cavanagh	<ul style="list-style-type: none"> - Economy: Council area must be not just business friendly but pro-business and pro-entrepreneurship placing a highest priority on supporting planning for businesses; supporting businesses and encouraging FDI businesses and supporting business entrepreneurs. Background statistics have been submitted in unemployment and Business Entrepreneurship for the District to demonstrate that Derry- Strabane could not be more distant from our economic development objectives than we are at present.
115.	Maria Bonner	<ul style="list-style-type: none"> - Expand Strabane town centre boundary to beyond the by-pass/Camel’s hump area. Preferable for the secure future of the town economically and socially. Must attract more investment to reinvigorate the town centre. Increasing the town centre will facilitate this.
116.	Barbara Curran	<ul style="list-style-type: none"> - There needs to be a city architect with special powers to safeguard the LDP and built heritage of the city. - Local councillors voting on planning applications shouldn’t be allowed. - It is unfair that there is no right of appeal. - Objectors need to be re-notified. - An applicant should not be allowed to seek automatic approval after five years. - Development Management issues regarding neighbour notification. - Policy Statements are aspirational and open to wide interpretation. - The LDP must be enforced if it is to have relevance, hence the above suggestions.

117.	Connall Sweeney	<ul style="list-style-type: none"> - GAA pitches needed in the city – all-weather GAA facility with flood lights – there is not one in the city.
118.	James Elliott/Niall McAteer	<ul style="list-style-type: none"> - Spatial Strategy -Settlement Hierarchy Option: Option 1 should be built upon to designate the area as one of wider regional economic significance given its unique cross-border position, the challenges as an unemployment blackspot and a potential Brexit black spot. - Economy – to limit the nature and extent of development could leave the old Strabane District at a distinct economic disadvantage compared to Derry and Donegal. Strabane lacks a current strategy that has genuine ‘buy-in’ from central government. - Strabane is categorised as a Hub and Main Town but what does this mean? Appears vague and unspecific. There must be possibilities for all parts of the new district to prosper and expand. The riverside presents an obvious location for future town growth. Can’t ignore the commercial, economic and other Brexit realities by self-imposing limits and constraints that could impede the uses of land right on the border. The riverside with Lifford should be the new centring point. - Economy – Issues and Options – Strabane Town Centre. At the Stakeholder event the only option supported was the extension of the boundary beyond the Camel’s Hump and By-pass however this has not been adopted in the options. It fails to take account of the ‘Three Rivers’ project in this location which will see the area towards the river completely developed alongside the Council’s own PEACE IV Riverine scheme which will also change the character of the riverscape along the land peninsula. Why has this extant approval been disregarded in the assessment? - Transport and Cross Border – if not addressed properly the new A5 road line and dual carriageway could be seen as an unintended cut-off point for Strabane town centre and an infrastructural barrier to on-going development and growth. If development is not co-ordinated with the new A, there is a real danger that the upgrade will become a faster by-pass, away from the town and its businesses altogether. The draft plan strategy should embrace the concept of mixed-uses on the Lifford Road site. - Retail – the Council is correct in its decision to re-evaluate our retail relevant boundaries. Maintaining the existing town boundary is not going to be fit for commercial purpose. The retail revolution has already happened and repeating the same planning mantra will not create opportunities for the people of Strabane. The Three Rivers Project is a commitment to help push Strabane forward on all fronts. - There is need for flexibility or perhaps ‘Brexibility’ in local planning and economic growth strategies. - Why is there no vision for the river frontage at Strabane. The riverside with Lifford should be the new centring point encouraging new convergence, clustering and growth in commercial and social activities.
119.	Michael Savage	<ul style="list-style-type: none"> - Agrees with LDP Objectives. - Natural Environment - Having a local designation has worked well in English Local Plans, allowing the protection of sites important at a District scale and identifying sites that could be enhanced as a result of any planning gain or biodiversity/carbon off setting required. LDP pressure analysis and Landscape Character Assessment – identify those areas of our Landscape with higher sensitivity or ‘at capacity’ and identify development that may be inappropriate in these areas (preferred option).
120.	Kevin McConnell	<ul style="list-style-type: none"> - Social Objective (vi) – no workshops in Glenelly Valley/Sperrin Area due to lack of accessible facilities. More Facilities need in Glenelly Valley. - Redevelopment and potential zoning of land at the former St Joseph’s High School. - Need proportionate development across the rest of the settlement hierarchy. - Need to maintain Cranagh as a small settlement and Plumbridge as a village.

		<ul style="list-style-type: none"> - Sion Mills should be maintained – there should be further designation towards Victoria Bridge. - LDP needs to look at the zonings for Strabane. There is an empty NI site in Strabane. It is in need of redevelopment – boundaries need re-evaluated. - Need to promote active travel in main hub and urban settlements – tourist greenways. - Tourism – Heritage Sperrin Centre – what should be done with it?
121.	Prehen Historical and Environmental Society - George McLaughlin and Damian Martin	<ul style="list-style-type: none"> - Hope that the areas such as the Prehen Ancient Woodland and associated pockets of this woodland such as the Hazelwood Triangle which is under threat at the moment (heavy machinery on this TPO site during the bird nesting season with no protective afforded to the listed trees etc.) will be given the level of protection which they really and truly deserve. - Prehen Historical and Environmental Society background documents enclosed.
122.	Eileen Walsh	<p>General Comments</p> <ul style="list-style-type: none"> - The statistics contained in the Preferred Options Paper (POP) point to a very deprived region with many social problems. - There needs to be a focus on young people in terms of additional leisure provision such as a Skate park to divert them from anti-social behaviour such as alcohol and drugs and to help address issues among this age group - such as poor mental and physical health and self-esteem. <p>The City Centre</p> <ul style="list-style-type: none"> - Need to think about what kind of city centre we want to have. At present, housing at Jefferson Court, close to Shipquay Street gives rise to a raft of anti-social behaviour. More suitable locations need to be explore for housing/accommodating young people. - The presence of gambling arcades in the area will only act to compound the issues. - Issues around safety. Local businesses along Shipquay Street have described drug dealing, abusive and obscene language, violence, have left international visitors, elderly people and families feeling terrorised. - This previously busy central street is now resembling a ghetto. - There needs to be a strategy to move these types of facilities out of the city centre. - The city centre could be made safer by encourage more people to live in the city centre above business premises. This would both enliven city centre and make it feel less threatening, particularly at night. - Would like to see a safe, vibrant, prosperous city centre, easy to access and navigate, with a pleasant stress-free shopping environment with a wide range of shops and businesses (and visitor attractions). - Needs to be a focus on independent local businesses that offer something different. These are what visitors want to see. They want something different from the shopping centre experience which is the same all over the world. - A strategy would help private businesses create footfall around the (inner) city centre. This must also be a priority...engaging indie businesses e.g. Yellow Yard, Bedlam, The Donegal Shop, Craft Village. etc. to help create a vibrant retail experience...unlike the homogenous product offering from shopping centres. - Local businesses struggle to survive in areas with poor footfall, evidenced also by the proliferation of charity shops, pound shops and also empty

premises, even on our most central streets in the city centre.

- At present not enough help and support is being given to these independent private sector businesses.
- An example of this is the fact that the council is unwilling to allow these businesses to have promotional material in council offices, despite the fact that these businesses pay rates and are often provide very attractive offerings for visitors to the city.
- This mindset needs to change, with more focus on the private sector, especially if we are to create a prosperous region.
- These businesses also regularly promote council-run activities, festivals etc. and stock council marketing brochures etc. so really there should be mutual support in this area. A lot of support, financial and otherwise goes to promote charities and social enterprises and places like the Craft Village, which many indie businesses deem unfair. Perhaps support in this area could be distributed more equally to include the independent businesses that really are struggling to survive in the city centre. Perhaps this could include more inclusion on council PR and marketing material;
- Given also the prevalence of online stores and the effect this has on local shoppers, independent businesses would really welcome support from council and otherwise to help develop e-retail business. This would definitely help grow these businesses, create employment and would also help generate more local wealth, particularly for businesses with export potential.

Parking

- Parking remains an issue both in terms of creating a vibrant, busy city centre but also within residential areas. Little to no attention seems to be given to parking at Magee and NWRC. Residents sadly have to pay for this oversight and many, especially elderly residents, are trapped in their homes during term time.
- According to the POP, the growth strategy includes: the significant student-expansion of Ulster University Magee, and North West Regional College, as part of a 'Knowledge Zone' (with new campus buildings, student accommodation, student servicing, city vibrancy and cosmopolitanism, as well as research/medical/hi-tech sector spin-off businesses.
- Planning applications likely to affect residential areas should have provision for parking built into applications. Recent developments at both Ulster University (Magee campus) and NWRC, while making ample provision for extra classes, students and teaching staff have made little to no provision for the parking requirements necessary to accommodate these groups.
- In terms of the city centre, there needs to be a focus on providing adequate parking. This should be low cost or better still, free, to accommodate shoppers, workers and visitors alike. Current on-street one hour parking is not sufficient. Derry's unique topography means that while it may not be politically correct, many people will always still want to take their cars. Provision in the big shopping centre car parks does not help the city centre...shoppers need to be feeding into the Diamond area and its surrounding streets, allowing footfall to reach the independent sector and also to ensure that visitors get the 'real Derry experience', not the same homogenous, multinational offering that they can get anywhere in any city around the world. Many shoppers who enter shopping centres simply park in the centre and don't even venture out into the wider city;
- There should be less focus on out-of-town developments. These only encourage the much documented 'doughnut effect' that has ravaged cities all around the developed world.

Entrepreneurship and Job Creation

- There needs to be more attention and support given to start ups and independent businesses.
- There is a huge wealth of creative talent in this region. This is one of the factors that make Derry ideal as a base for a film industry, which would create huge employment opportunities and would also bring much-needed resources into the area. The spin-off would have a great effect on hotels, restaurants and shops (as it has had and is having in Belfast, where practically all NI Screen funding goes) and I think the council should give serious consideration to supporting a Film Office in the city to help kick start this process.

		<ul style="list-style-type: none"> - Small pots of funding for local film makers would help start-ups get projects up and running. Belfast is unlikely to help us with this, so I think we really need to be doing this in Derry for ourselves. - I would like to see council revisit the Honeycomb Creative Works programme, an excellent initiative which helped stimulate the creative industries. Small awards and grants, (5k, 10k, 20k) of which I was a beneficiary, are vital for start-up digital entrepreneurs, particularly in their early stages. Also it is worth noting that jobs in the creative industries tend to be high-value and there are often lucrative spin-offs for the local economy. - It is also worth noting that the transparency of the awarding of these financial incentives by Honeycomb through a competitive process and indeed the relatively simple application process itself made it very successful and this is something that I feel would be useful to bear in mind. - Another area I think council should consider is opening up more funding opportunities to these local creative businesses and independent artists. Perhaps this could happen when council are looking for new ideas for events and festivals or to tackle certain subjects or campaigns. As well as working with existing providers and organisations, it would be good to see council open this up so that individual artists and local creatives could also apply for these through competitions and small grants. This might provide us with more tangible benefits rather than spending so much money on reports and consultants. <p>Regional Gallery</p> <ul style="list-style-type: none"> - The city should seriously consider having as part of the POP a regional gallery at Ebrington. This would be a flagship destination for international visitors, who would spend money in the city, in local restaurants and hotels and shops. It would create employment for our young people and opportunities for our creative community to develop and sell their work.
123.	Peninsula Group	<p>Retail - City Centre, District Centre, Local Centre</p> <ul style="list-style-type: none"> - With the exception of the Waterside all district centres on the west bank are trading marginally and are vulnerable to closure. The west bank district centres were state funded i.e. Shantallow and Creggan and would not have been built had they not been parish centres funded by the taxpayer at the expense of existing retail. - <u>Springtown Centre</u> is not in the former category but is solely private capital funded with 25 year declining market share by Dunnes and with new build 98% vacant since 2006. Retail trade in the city has migrated from all streets on the west bank into Foyleside at the expense of all independent retailers including Richmond Centre losing its anchor tenant to Foyleside in 1997. - <u>East Bank Retailing</u> surpasses all district and local centres on the west bank despite the preponderance of population located on the west bank. - A benign planning policy facilitated American style strip mall retailing from government owned sites on both sides of Lisnagelvin roundabout i.e. Lisnagelvin District Centre and former DOE Road Service lorry depot that was granted Class 1 Retail planning on the former B&Q permitted site. The expenditure retail imbalance between Cityside and the Waterside is reflected in the rental figures that your office has access to from the Lands and Valuation Office. - Public sector planning policies have distorted and destroyed private capital investment by the independent business sector. The preferment of the multi-national via both grant aid and planning permission on sites that were never retail locations has brought the planning system into disrepute over the past 30 years. - A new paradigm in planning policy can now be implemented through local control and local accountability that in time will regenerate the streets of this city for the benefit of both residents and the visitor.

		<ul style="list-style-type: none"> - An historic city as the stone clad monuments on the main approach roads proclaim will not be attractive to tourists or prolong their stay with roller shuttered vacant shops. The late Martin McCrossan promoted the historic attractions of the built heritage of this city as a tourist destination with much more to offer than Galway in the historical lineage and infrastructure. - Industrial The Council's realisable but not overly ambitious employment target requires land on the west bank already designated for industry to remain industrial usage and not to be filched by retail. The Skeoge lands that the L.Derry Area Plan 1981-1995 were being de-zoned at the behest of the Dept. of Agriculture (now River Agency). The reasons given in 1981-1985 period was undue cost of storm drainage diversion of Skeoge River requiring tunnelling under Croppy Hill to the Foyle. A public enquiry instigated by myself repudiated their argument by independent engineers proving storm drainage could be directed to the Foyle via Buncrana Road. This allowed Fruit of the Loom to open their factory prior to it becoming a B&Q site. The former Rugby Club site was sold subject to planning for DIY. My intervention with the support of City Council members retained this land for Seagate where 1400 are employed. A similar outcome can happen on the Arntz site. - Housing The Derry Area Plan 1995-2011 Skeoge Area was blighted by the public sector refusing to extend the Skeoge Road from Fernabbey Estate completed section in 1995 and left uncompleted and not extended to join the Buncrana Road until November 2008. The majority of housing landowners were locked into the delayed infrastructure by Road Service and by the time the road was completed the banks and the builders were bankrupt. - The so-called master plan for public sector private housing interlinked and interposed became a disaster plan in so-called social engineering when those with power qualify an adjective to a noun it's time for the private investor be he a builder or someone with the burden of a 25 year private mortgage to run a mile. - I accept socio-economic factors where housing is funded solely by public taxpayer's money. I do not accept social engineering where private risk capital always difficult to obtain and now more difficult should have imposed on builder and purchaser market distortion and value damaging policies for sociological reasons. - No one has the right to impose a crippling pledge not least in the failed marketplace that is Derry that will blight the value of their house by state edict on house ownership type. The prudent purchaser knowing this and the lender will refuse to be involved. - When pepper potting to use the phrase becomes the policy it's time to recognise that '<i>peddling perception and managing darkness</i>' may entrap the unwary but will not fool the prudently informed If you want private housing development and banks to lend you must not blight the prospects of private sales by mixing the burdened mortgagee with a 25 year loan with those gifted a similar house at the expense of the ratepayer and if you do you are taking power without responsibility and prudent businessmen will not invest. - Future Housing Lands. The oldest Parish in the City – Long Tower, Bishop St area extending down to the Letterkenny Road has been deprived of development infrastructure out to Molenan. The Foyle riverbank on the west bank via the Lettekenny Road has the topography that would attract private housing in the higher socio-economic category that would be lower density and adornment to the river landscape. - The City Council needs to see the merit of capitalising on this undeveloped land in close proximity to the city that could be easily developed and one that would appeal to existing private house owners who were looking for larger homes. It is the only relatively undeveloped access road from Donegal to this City.
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		<ul style="list-style-type: none"> - The City Council recognises that successful communities need businesses that are willing to invest. The rates burden increases yearly adding to commercial bankruptcies and vacant shops. In Limerick City a rates sabbatical is given for two years to encourage new entrants and it is working and has helped to regenerate the traditional shopping areas that were damaged by peripheral centres. - Derry City needs to recognise that the policy of demanding rates on vacant commercial properties in the failed marketplace that is Derry prevents the uptake of existing properties being let because the rates are now priority charge ahead of any bank charge due to the greed and propensity of the rates office to issue court proceedings, not even the reviled money lender moves as fast as the so-called Land and Property Rates office when it comes to extracting money from owners or leaseholders whose income is non-existent and those premises are unlettable.
124.	<p>Garvan O'Doherty</p>	<p>Infrastructure What future options are being considered in respect of City of Derry Airport? There is also no reference to the future of the Foyle Street Bus Station (particularly in light of the Hub proposal for the Waterside?)</p> <p>Vision and Objectives Would like to see the creation of 18, 000 jobs rather than 15, 000.</p> <p>Growth Strategy</p> <ul style="list-style-type: none"> - While there is support for a strong and prosperous NW Region, with Derry at its hub, it is difficult to understand how the 'Metropolitan City Region' will work in practice. It is also the case that, despite the concept being mooted for some time now, neither the RDS or the NPF (or indeed the POP) have set out any practical measures as to how the 'Gateway Linkage' will work in investment and growth terms. In fact, it appears that Derry and Letterkenny remain towns in competition, proof of which is the high levels of retail development in Letterkenny in recent years. - Clarification as to how this cross-jurisdictional planning concept will work out in practice would be of great benefit to the credibility of the LDP and Derry's onward course to developing and strengthening its role as the NW City Regional Hub location. - Would like see the LDP take on bolder and more ambitious approach by adopting 'The Optimum as a City Region' option with new jobs at 18,000. If the City wants to develop its role as a City Region, its Growth Strategy should and must reflect this. <p>Spatial Strategy</p> <ul style="list-style-type: none"> - The Spatial Strategy requires much further consideration during the subsequent plan process in terms of; <ul style="list-style-type: none"> ▪ Infrastructure and Movement ▪ Derry City Centre ▪ Strategic Growth Zones ▪ Heritage Planning ▪ Public Space and Place-making ▪ The Riverside Regeneration ▪ Housing and Land Allocations ▪ New Community Servicing ▪ Practical Planning Measures which Promote the Derry/Linkage Strategic Linkage ▪ The Future development/expansion of Strabane <p>Derry City Centre</p>

		<ul style="list-style-type: none"> - Concurs in principle with the POP in terms of a future review of the 'Central Area' and 'Commercial Core' to create a more rational spatial planning policy in respect of a City Centre City Strategy. Such a review must recognise the significance that those developed areas within the 'Commercial Area' and which are now established as part of the city's commercial infrastructure and form a northern Gateway into the City along the Culmore Road off the New Bridge. - Disappointed that the POP does not include Strand Road in this category, particularly at the point along Queens Quay, opposite the current PSNI Station on Strand Road. This site is currently partially derelict and under-used and detracts from the appearance and character of this main arterial route into the City Centre. <p>Settlements – Place-Making and Design Vision</p> <ul style="list-style-type: none"> - Strategic leadership and intervention must involve a working partnership bringing together the public, private and community sectors. This will aid the process of developing a vision which is investment-led within the framework of an agreed LDP. - The LDP should set out an ambitious spatial plan which. <ul style="list-style-type: none"> ▪ Identifies key development sites. ▪ A 21st Century Riverside such as those created in Bristol, Aker Brygge (Oslo), Shad Thames/Butler's Wharf (London) and Dublin. ▪ A City Wide public realm plan. ▪ A heritage-led development of the Walled City. ▪ A Connections Plan, highlighting safe pedestrian access, a car parking strategy and a public transport plan. <p>Other Areas of Interest Interests of the Garvan O'Doherty Group</p> <ul style="list-style-type: none"> - The POP identifies spatial issues and material such as development sites, the 'City Centre' and infrastructure improvements, The Group think it is appropriate to make comments concerning specific strategic land holdings, in the City, which are in The Groups ownership and for which it is currently considering major development options. These sites include:- <p>St Columb's Hall/Walled City Performance Quarter</p> <ul style="list-style-type: none"> - In summary, it is the intention of The Group aims to create a new performing arts and cultural quarter in the heart of the Walled City. This would involve the refurbishment of the Hall to include an 860 capacity theatre, a 110 capacity smaller theatre and 2 ballrooms. A variety of other options might also be included such as a hotel, a classical music school, a café bar and a 'Fame Academy'. A further longer term plan could include the relocation of the Central Library service, and the creation of an iconic building on Foyle Street to provide a classical music school. <p>Compliance with the POP</p> <ul style="list-style-type: none"> - The beneficial re-use of a much loved heritage asset. - Adding to the vitality and vibrancy of the Historic Walled City. - Developing a partnership across performance venues to create a visitor destination of significant critical mass; Promoting the wider regeneration of the Walled City. - Putting arts and culture at the heart of the project. <p>Shipquay Place/Foyle Street City Centre Hotel</p>
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		<ul style="list-style-type: none"> - The Group has already been granted planning permission for a boutique hotel on the site, but is currently seeking to alter that permission to include 35 beds, a bar on Shipquay Place, a first floor restaurant on Foyle Street and a further bar and entertainments area behind the existing Dooley's Bar. <p>Compliance with the POP</p> <ul style="list-style-type: none"> - Re-use of building of unique townscape value. - Promoting the much needed regeneration of Foyle Street. - Creating active ground floor uses along Shipquay Place. - Promoting tourism in the heart of the City Centre. <p>Queen's Quay Flagship Riverside Development</p> <ul style="list-style-type: none"> - The Group envisage this site providing the most significant opportunity to develop a unique flagship scheme along the riverside. The scheme could accommodate a 5 star hotel with roof garden, a top class restaurant, Class A office accommodation and ground and first floor retailing. The building could be Derry's IFSC in form and raise confidence and our ambition as a City Region. <p>Compliance with the POP</p> <ul style="list-style-type: none"> - Promoting the regeneration of the Commercial Core. - Making beneficial use and re-modelling of derelict part of the riverside, one of the City's 'pivotal locations' as identified in the POP. - Promoting high end tourism, making a significant contribution to the visitor economy. - Providing Class A office accommodation, in keeping with the City's regional status. - Creating an iconic architecture project. <p>Da Vinci's City Gateway Development</p> <ul style="list-style-type: none"> - The Group recognises the strategic location which Da Vinci's occupies. As such it is of the opinion the site could be doing much more in terms of its contribution to the Derry/NW and wider economy. The concept for the site includes an extension and major upgrading of the hotel and the development of a landmark entertainment complex, all affording a greater sense of place than at present, creating new Northern City Gateway, complementing plans for the development of Fort George as a high end Science and Tech Park. - Making beneficial use of proposed infrastructure investment. - Promoting a new standard for the City in the entertainment sector. - Reinforcing the presence of the proposed Fort George development. - Creating a new concept in hotel and family entertainment. - Making better use of a strategic with a more development and high quality development. <p>The Waterfoot Hotel Development</p> <ul style="list-style-type: none"> - It is envisaged that the hotel would be extended to 100 bedrooms, using land owned by the Group. - Delivering more high quality visitor accommodation. - Strategically located and highly accessible site. - Near to both the City Centre and City Airport. - Overall support for the Councils work to date on the development of the LDP, except where concerns have been put forward in this submission. - Concern at the paucity of a bold and ambitious approach to A Growth Strategy.
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		<ul style="list-style-type: none"> - Support for the Councils emphasis on the re-modelling of the Riverside as a key City Region regeneration location. - Support in principle for the Councils approach to place-making and a design vision. - Support in principle for the preferred heritage-led approach to the care, enhancement and development of the City's heritage assets and the Walled City. - The Group trusts that the comments made, and the development sites/projects identified in this submission, will be helpful to the Council in its ongoing work on the LDP over the coming months, to adoption in 2020.
125.	Laura McCausland	<ul style="list-style-type: none"> - No comments on questionnaire. Advised that supporting documents will be sent in.
126.	John Toland	<ul style="list-style-type: none"> - Inclusion of lands at Killea Road, Killea.
127.	Bart O'Donnell LLB on behalf of Boomhall Estate	<ul style="list-style-type: none"> - Support for the Councils emphasis on the re-modelling of the Riverside as a key City Region regeneration location. - Support in principle for the Councils approach to place-making and a design vision. - Support in principle for the preferred heritage-led approach to the care, enhancement and development of the City's heritage assets and the Walled City. - The Group trusts that the comments made, and the development sites/projects identified in this submission, will be helpful to the Council in its ongoing work on the LDP over the coming months, to adoption in 2020.

LDP Preferred Options Paper and the Strategic Growth Plan PUBLIC CONSULTATION EVENTS – June 2017

A series of 16 consultation events as detailed below were held across the City and District during June 2017. These meetings were held during daytime and evening to encourage a wide participation, including carers, those with dependents and those in full time employment. Given the overlap of the Strategic Growth Plan there was an opportunity for joint consultation events. The following table details the venue, the number in attendance and a summary of the Issues raised.

DEA Location	Issues raised
30 th May 2017 The Guildhall – POP and SGP Launch Attendance: 25	<ul style="list-style-type: none"> • General Discussion about SGP and Integration and Importance of the LDP.
6 th June The Moor / Derry Central DEA (Guildhall - evening) Attendance: 4	<ul style="list-style-type: none"> • Develop USP in terms of economic development and develop / promote District accordingly. • Manage expectations – aspirations need to be grounded in reality and evidence-based. Needs to be convinced as to the potential for the District as currently set out in the SGP. • Will Transport NI relax their requirements, in support of the priorities identified by the Council e.g. rural businesses? • Will some Councils have policies to attract and compete for businesses v other Districts? • Address segregation in schools and housing.
7 th June The Moor / Derry Central DEA (Guildhall - pm) Attendance: 11	<ul style="list-style-type: none"> • Readability of POP document was considered to be ‘good’ • Understanding existed as to our housing issues and need for enhanced design • If there were not to be new / additional house zonings, this would be a surprise / disappointment and may stifle attempts to promote multi-tenure type developments. • How would our ‘deliverability’ of sites test work? • Developers “would not be keen” to develop major private schemes in close proximity to large social zonings – this is “the reality of economics” • Need ‘affordable’ housing as well as social and private • Desire for cross-community sites • New housing needed for University expansion – in HMOs or purpose-built like Belfast? • Would there be new housing in Strabane and where?

<p>7th June Strabane Town The Alley Strabane Town (evening)</p> <p>Attendance: 6</p>	<ul style="list-style-type: none"> • How to deliver employment in central locations, supporting ‘town centre first’ to re-generate and re-populate the town. Build central Regional College and a central hub for investment in Strabane, not peripheral sites. To be bus-accessible, including new Town Centre Bridge to Depot. • Would the exclusion of the 3-Rivers area from the Town Centre limit the scope to regenerate the area and maximise Riverine links? • Need to balance development across the District, embrace the potential of cross-border developments and consider the implications of Brexit. • Will the Councillors be able to over-rule ‘the Planners’?
<p>9th June Strabane Town The Alley Strabane Town (pm)</p> <p>Attendance: 2</p>	<ul style="list-style-type: none"> • Housing mix – how will they be delivered / tenure types? • Important to have playparks in residential areas • Exploit ‘the wetlands’ from Riverine / Greenway / Canal at Ballymagorry for an open space resource. • The place-making vision for Strabane town, important to have visual representations of key sites proposals and consult the community on them. • Need good broadband in rural areas, to support the Council’s objectives for more rural employment.
<p>13th June Foyleside DEA Magee Hall (evening)</p> <p>Attendance: 6</p>	<ul style="list-style-type: none"> • Education – “crucial to our recovery”, getting skilled people / job sectors, but we also need to provide land for all grades of jobs / business types. • Train upgrade – need to improve and a link to Strabane was suggested, in addition to some A5 upgrade. Trains and bus services also better for tourism. • The rural and urban issues have been considered in both the POP and SGP. Rural living / economy – how do we keep viable? Need rural schools, families / carers and a mix of people. • Concern to control unsustainable one-off housing in countryside. • Need facilities for tourists e.g. coffee shops, toilets in city / town centres. Need a site for camping / motorhomes. Cycling facilities. • Out-of-town retailing – not conducive any more. “Retailing has changed”. Worsening traffic on Crescent Link.
<p>15th June Foyleside DEA Glen Community Centre (pm)</p> <p>Attendance: 7</p>	<ul style="list-style-type: none"> • Key economic issue will SGP & POP deliver the economic growth as stated? Much scepticism after One Plan. • Need for INI to deliver a Sub Regional Strategy for our District. • Education, up-skilling and University direction needs to be directly relevant to the jobs and investors we are seeking. • Need to stop the brain drain and up-skill those who have not sought or did not get the opportunity to develop appropriate job relevant skills. • LDP needs to be flexible and promote local business sector and entrepreneurship – too many relying on Central Gov. employment. •

<p>15th June Faughan DEA Claudy Community Centre (evening)</p> <p>Attendance: 3</p>	<ul style="list-style-type: none"> • Welcome for Council consideration for Claudy to potentially move from Village to Town. • Appropriate development could be anticipated – particularly in line with Rural Development role. Village currently seen as providing a significant community role for large surrounding rural area. • Mixed community / house types / tenure character praised and this would wish to be continued. • Excellent sporting provision in village which channels the energy and passions of extensive youth population in village and in surrounding areas. • Excellent schooling links and ongoing work to develop A level schooling in the village. • Representatives sought more ‘social justice’ from Central Gov. for the young population. • Felt any future ‘town’ development needed to be appropriate. Start-up rural economy- could Claudy offer such initial sites?
<p>16th June Faughan DEA Claudy Community Centre (pm)</p> <p>Attendance: 4</p>	<ul style="list-style-type: none"> • A feeling of overload in respect of emerging plans/consultations. Difficult to keep track; • Concerns were raised at the potential impacts that the reclassification of settlements would have on Rural Development Funding. It was explained that the terms of definition are different from both Planning and Funding perspectives; • It was felt that the Central Area boundary in Derry inhibited the growth of the town centre; • A lack of appropriately sized sites in Derry and Strabane to encourage the Multiples; • Council to be commended on its recognition of the rural area and its importance in terms of sustaining vibrant rural communities. A feeling that nothing will thrive without a population to sustain the rural area; • Loss of population to Belfast and ‘brain drain’ abroad; • The Sperrins is an asset which has not been fully exploited and the opportunity should be seized to harness and attract national and international tourists – including those visiting Derry. Comparisons made with the Scottish experience whereby hillwalkers/visitors help to sustain rural businesses such as small hotels, bars, craft shop and specialist foods. • Query made on how windfarm development can be controlled; • Recognition that windfarms can produce cheap energy which could attract businesses to the rural area.
<p>19th June Derg DEA Derg Valley LC (evening)</p> <p>Attendance: 5</p>	<ul style="list-style-type: none"> • The Community Plan is ‘Up in the Sky’ due to the Brexit issue; • The ‘indecision’ around Brexit is causing people to migrate back to the North. Lots of houses in the South are now being put up for sale; • The expansion for Magee,/A5/A2 won’t benefit the rural area and there is uncertainty how it will translate; • Loss of services in Sion Mills. Doctors Surgery and Library have closed in recent years;

	<ul style="list-style-type: none"> • Potential to transform The Mill in Sion Mills into suitable housing for retired/elderly population; • Housing is polarized in Castlederg. Are there mechanisms through which planning can address this issue to create better religious balance? • Concerns raised around how large scale housing developments in villages can adversely affect the character of villages and upset balanced demographics; • A need for mixed housing types to accommodate elderly/single/small family households.
<p>20th June Derg DEA Derg Valley LC (am)</p> <p>Attendance: 5</p>	<ul style="list-style-type: none"> • Will Council be consulting with DEARA regarding designations and restrictions in the rural areas, ASSIs and AONBS? • Concern with decentralization of Castlederg town centre, what protection is there as we don't want to see what happened in Strabane (ASDA) happen to Castlederg. • Redevelopment of Police Station. • The Enterprise Centre is full and there is currently no vacancy within the town centre but the Police Station would be ideal for Businesses. There is also the potential for social housing within this Site and good example of Policy Station redevelopment is at Broughshane. • Is there going to be a multistorey car park in Strabane? • Regarding designation hamlets and villages will be working with DAERA regarding how we will do this? • Concerns regarding accuracy of population figures, Sion Mills population has reduced from 3,000 to 1,900, doesn't think this is accurate. • The figures presented regarding the ageing population, will there be appropriate long term services to address these needs. • Victoria bridge Lights, Peace iv Project, there should be a similar project for Castlederg bridge. • Heavy goods lorry's using Clady road. • Rural Development Programme, and it designation of villages and hamlet when will this be issued? • Newtownstewart. Built heritage and Conservation Area, what is included within this? The two Castle are not accessible to the public. • Future public footbridge should also be mentioned if not already.
<p>20th June Sperrin DEA Donemana (evening)</p>	<ul style="list-style-type: none"> • There has been an extensive round of consultations during the past 2 years. • A mix of housing types is required to cater for groups such as the elderly, small families and single people; • Rural dwellers don't get VFM as rate payers in terms of road gritting, street lighting etc;

<p>Attendance: 2</p>	<ul style="list-style-type: none"> • Donemana is detached from the larger service centres such as Derry and Strabane bus times are infrequent. Harkness Gardens, Derry provides a good example of a housing scheme which meets the demands of different households and sizes; • The closest supported housing schemes/care homes are located in Newtownstewart, and Strabane; • No proper youth facilities. The existing facility amounts to a portacabin; • Good 3G sports pitches; • Too many halls (orange, masonic and church halls) which can't facilitate specialized activities; • Poor Broadband and Mobile coverage. Orange and EE is quite sporadic; • There are opportunities to exploit the tourism potential of the area. For example, Silverbrook Mill could be restored with walks along the Dennet River to Altishane. The area has 16 redundant mill sites, a semi-ancient Oak woodland and abundance of other woodland areas; • Few opportunities for young people who are gravitating towards Cork and Belfast.
<p>21st June Sperrin DEA Donemana (pm)</p> <p>Attendance: 2</p>	<ul style="list-style-type: none"> • Comments made about including older people in the SGP more. More of an emphasis on young people and youth. There is an ageing population. For e.g. the creation of parks for young children should also include facilities for older people who also attend these parks with their grandchildren such as signs, toilets, seating, rain shelter. It needs to be multigenerational etc. They should be put in locations where they are not isolated. • What is the definition of balanced communities? • There are restrictions on the private rented sector in the countryside. There are higher rates pushing people out of the countryside and restrictions about building in the countryside. • A health impact assessment needs to be carried out. • Wind farms are an issue in the countryside. • Is there a proposal to develop the Old High School site.
<p>22nd June Ballyarnet DEA Leafair (evening)</p> <p>Attendance: 7</p>	<ul style="list-style-type: none"> • Skills Barometers, need stem subjects • Concerns about the ageing population, challenge for Planning, housing, transport and recreation. • Need to break the cycle of unemployment, out migration and lack of skills – high level and trades also. • Anti- social behaviour is a serious issue.
<p>23rd June Ballyarnet DEA Leafair (pm)</p>	<ul style="list-style-type: none"> • Social facilities within local area an issue • Meaningful open space provision needed • Concerns of large size of social housing zonings, • Facilities for older citizens required.

<p>Attendance: 10</p> <p>27th June Waterside DEA St Columbs Park House (evening)</p> <p>Attendance: 10</p>	<ul style="list-style-type: none"> • “Enthusiastic for future but cynical based on previous performance” • Prehen Woods case figured highly in the debate. All parties agreed our District’s fortunes can’t be turned around purely on woods and squirrels, but environment needs to be transparently included and considered in all our planning reasoning. The SA will assist and better liaison with reasoned baseline information provided and exchanged where necessary to support pertinent arguments. • Policy interpretation – need to be robustly written • We don’t have a city architect • How do we get the Council Planning Committee to buy into the strategic vision – this is crucial – where is the accountability for the Corporate vision of the SGP & LDP over the party political voting? • Enforcement – needs to be more proactive. • Mother Earth needs to be given rights at an IE – Bolivia, I was informed on the night, have recently legally done so to ensure complete consideration of all environmental issues. • Zero Waste NW – waste consideration needs higher profile. • One attendee expressed his views on wind farms, silver mining and global powerbase for decision making in private. • Transport was a big issue for Crescent link residents. New house building adjacent was concerning - impact at Christmas. • Rates - crippling the district – need to be reduced. • Car parking – if encouraging city / town centre first, we need to make these areas attractive to our visitors – not governed by parking zealots. – explained we are also trying to reduce car usage to these areas so a balance is sought. • Rents – what will the LDP do to address these. Explained not an direct issue for or controlled by the LDP but will form an important part of the consideration around tenure types / house styles
<p>28th June Waterside DEA St Columbs Park House (pm)</p> <p>Attendance: 4</p>	<ul style="list-style-type: none"> • £3.8bn mentioned in SGP– is that a final figure? What is the reality of what money from the £1.5bn promised by Gov. coming west? • Quarry Products Association – if there is money for the transport hub there needs to be a sustainable supply of minerals and aggregates. Council need to do an assessment of what aggregates are available especially if there are to 12k houses to be built. There needs to be a sustainable supply of resources. The Council needs to speak to local operators to work out supply and demand. • Education and skills needed for not just higher education but nursery and pre-school to ensure a stronger prevention model. • Need to look at postcodes and deprivation. There are services where boundaries don’t align. Peace 4 funding impacts. • Would like to see more social housing in the waterside – along Trench Road. What is the Strategy for achieving mixed housing?

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| | <ul style="list-style-type: none">• SGP – Global skills need to be developed. Community and social interactions not seen in the plan. Needs to be networking models and practice. Youth exchange over a week better than 2hrs/week.• Yearly feedback needed re the progress of the plan to show we are actively making progress.• No mention of the Airport in the SGP.• We can have all the plans we need but we also need the political will. There is natural cynicism.• There should be more apprenticeships available/promoted in the District through the NW College and local businesses.• NISRA figures are saying that there are 600 people leaving the District every year. There is a youth exodus study carried out where it said that 89% of youth would leave the District |
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