

**From:** Aoibhinn Roarty <aoibhinn@mkaplanning.co.uk>  
**Sent:** 31 January 2022 15:15  
**To:** Local Development Plan; Planning  
**Cc:** Matt Kennedy; Paddy McLeary; Niamh Mullan  
**Subject:** LDP - Schedule of Proposed Changes Consultation Submission  
**Attachments:** LDP Proposed Changes Submission - Proposed Changes.pdf; LDP Proposed Changes Submission - Buncrana Road.pdf

Dear Sir/Madam,

**RE: LOCAL DEVELOPMENT PLAN 2032 - SCHEDULE OF PROPOSED CHANGES CONSULTATION**

I refer to the above matter and attach 2 submissions in relation to same.

I would be grateful if you could confirm receipt of these submissions.

Please let me know if you require hard copies or anything further in relation to these submissions.

Kind Regards,

Aoibhinn

--

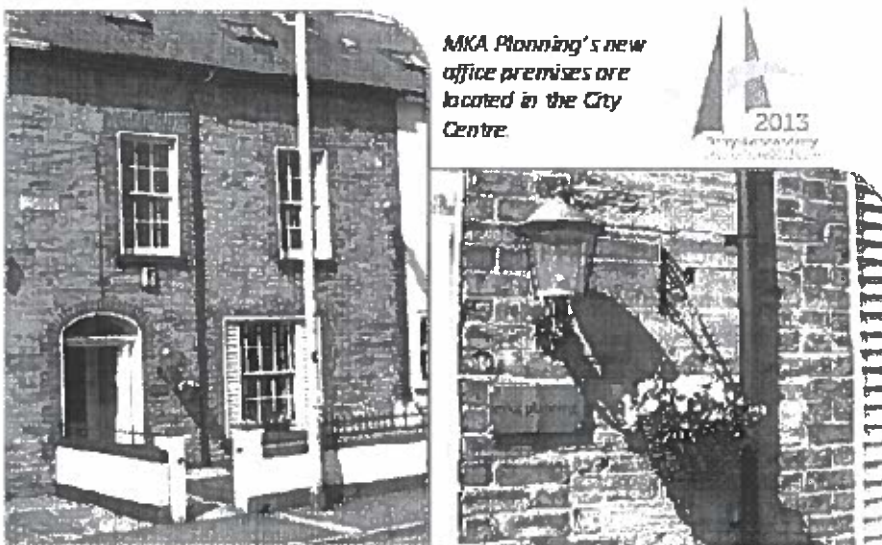
Aoibhinn Roarty  
Town Planner  
MKA Planning Ltd



32 Clooney Terrace  
Waterside  
Derry  
BT47 6AR

Tel. 028 71 311551  
Fax. 028 71 313404

MKA  E-mail: [aoibhinn@mkaplanning.co.uk](mailto:aoibhinn@mkaplanning.co.uk) Web: [www.mkaplanning.co.uk](http://www.mkaplanning.co.uk)



 Before you print think about the ENVIRONMENT

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity for whom they are addressed. If you have received this email in error please notify the system manager.

Please note that any views or opinions presented in this email are solely those of the author and do not necessarily represent those of the company.

Finally, all emails are scanned and checked for viruses but the recipient should check this email and any attachments for the presence of viruses. MKA Planning Ltd accepts no liability for any damage caused by any virus transmitted by the email.

---

**RE: DERRY CITY & STRABANE  
DISTRICT COUNCIL;  
LOCAL DEVELOPMENT PLAN  
2032  
DRAFT PLAN STRATEGY  
SCHEDULE OF PROPOSED  
CHANGES CONSULTATION**

---

**Lands off  
Buncrana Road**

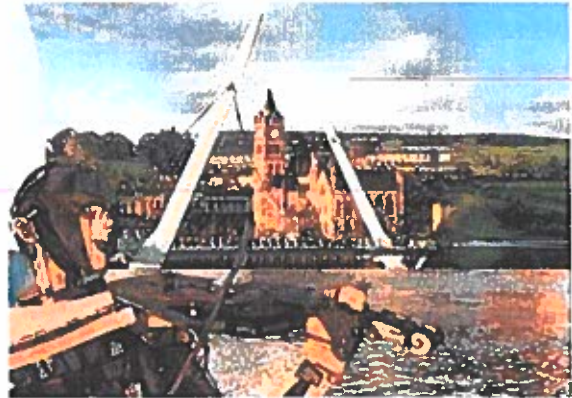
---

*ON BEHALF OF*

---

*Mr Patrick Doherty*

---



*AUTHOR*

**Matthew William Kennedy BSc (Hons)  
DCA, Dip TP, MRTPI**

---

32 Clooney Terrace,  
Waterside, Derry, BT47 6AR

Tel: (028) 71 311551  
Fax: (028) 71 313404

Web: [www.mkaplanning.co.uk](http://www.mkaplanning.co.uk)  
Email: [admin@mkaplanning.co.uk](mailto:admin@mkaplanning.co.uk)

1.0 Introduction.

1.1 Derry City and Strabane District Council has published a Local Development Plan (LDP) -Draft Plan Strategy in December 2019 for public consultation. A further public consultation was carried out by Council in September 2020.

1.2 Following consideration, the Council is now preparing a number of changes to the LDP Draft Plan Strategy. One of the proposed changes is PC 41C – NEDA Designation which proposes the following revision:-

*At the end of the main paragraph, insert "section of the City. Strategically, it should be located on the mid-outer area of the Bunrana Road, with its scale and nature and boundary to be decided at the LDP Local Policies Plan stage, taking account of the existing ED land supply in the area and adequate to meet local- specific and accessible- employment requirements"*

1.3 I am instructed by my Client, Mr P. Doherty, to write to the Council in support of the Council's specific proposal - Proposed Change – PC 41C.

1.4 This Practice has written previously supporting the designation of a New Economic Development Area (NEDA) at Bunrana Road and submitting various representations to the Draft LDP how it should be developed. This representation should be considered in conjunction with the earlier submissions.

- Bunrana Road 1 – Economic (LDP-PS-REP-124A)
- Bunrana Road 2 – Social Housing (LDP-PS-REP-124B)
- Bunrana Road 3 – Mix (LDP-PS-REP-124C)

1.5 I set out below our reasons for supporting the proposed designation of the NEDA.

2.0 Material Planning Considerations.

2.1 In support of the LDP's proposed New Economic Employment Opportunity Area (NEDA) Bunrana Road designation (Page 117) and the Council's proposed changes to the wording of the policy, I set out below the following supporting information:-

2.2 The Council in its Industrial Land Monitor for Derry City in Table 2 below, set out the existing remaining capacity on zoned industrial land in 2017.

**Table 2: Estimated Remaining Capacity (ha) on Zoned Land**

Settlement	Location	Area Zoned (Approx. ha)	Area Remaining Undeveloped (approx. ha) 2013	Area Remaining Undeveloped (approx. ha) 2017
IND 1 Culmore	Derry	44.5	42.1	42.1
IND 2 Skeoge	Derry	30.2	15.9	15.9
IND 3 Buncrana Road	Derry	14.4	10.2	10.2
IND 4 Springtown	Derry	4.2	0	0
IND 5 Campsie	Derry	21.1	13.4	13.4
IND 6 Maydown	Derry	79.3	65.3	65.3
IND 7 Newbuildings	Derry	13.5	5.6	5.6
MU 1 Iona Park (Mixed Use)	Derry	1.9	0	0
<b>Derry Total</b>		<b>209.1</b>	<b>152.5 (73%)</b>	<b>152.5 (73%)</b>

Source: Industrial Land Monitor 2017 - LDP.

2.3 Table 2 indicates that there is 152 hectares of undeveloped industrial/employment land undeveloped around the City in 2017. However, specifically in relation to industrial/employment land provision on the Cityside of Derry the following material planning considerations are material, namely:-

1. In terms of Zoning IND 1- Culmore, it is noted that this is a historical zoning of longstanding, that the only development on this zoning is the existing Grant's Bacon Factory which is also of longstanding and actually predates the zoning. I am unaware of any new development on this industrial zoning in the last thirty years. This industrial zoning dates back to the Londonderry Area Plan 1981-1996 which required any developer of this zoning to first carry out the Culmore Bypass proposal which has never been carried out. The prospect of this land zoning being developed for industrial/employment uses in the near future is considered highly unlikely unless a major industrial operator was secured for the land who could provide the infrastructure requirements. These considerations realistically removes these 42 hectares from the consideration. I attach a copy of this zoning at Appendix MKA 1.

2. In terms of IND 2 Skeoge, I set out at Appendix MKA 2 an aerial photograph and planning history schedule at Skeoge Industrial Estate. It is noted that Skeoge is under the ownership of Invest NI and this land is only available for Invest NI companies. I note that there has been two recent small developments carried out at Skeoge since the previous Monitor in 2017.
3. In terms of IND 3 – Buncrana Road now known as Elagh Business Park the Council's Industrial Land Monitor indicates that there is 10.2 ha of this Park undeveloped. However, I attach at Appendix MKA 3 an aerial image and planning history schedule for Elagh Business Park indicating that all of the land is either developed or committed for development. It is noted that a Certificate of Lawful Development has already been granted by the Council for a data centre, previously approved on the Elagh Business Park. A search of estate agents in the City indicates that there are no sites to purchase/lease currently at Elagh Business Park. This clearly indicates there is no available undeveloped land for industrial/employment use at Elagh Business Park.
4. In terms of IND 4 – Springtown, this 4.2 hectares of land was developed by Seagate Technologies in the 1990's and this land is now fully developed. I attach at Appendix MKA 4 an aerial photograph and planning history schedule which further illustrates that Springtown Industrial Estate is now fully developed with the development of Lidl on the former Perfectseal site.
5. In terms of Pennyburn Industrial Estate, I attach at Appendix MKA 5 an aerial photograph and planning history schedule which indicates that planning permission has been granted for a food store and health centre on the former Arntz and Euro Centre West site.
6. In terms of MUI – Iona Park, a mixed site of 1.9 hectares this land has been fully developed since the late nineties and I attach an aerial photograph at Appendix MKA 6 illustrating this point.
7. In terms of the Fort George Special Employment Opportunity Area it is noted that a significant proportion of this land has now been sold to allow the development of a health centre hub for the Cityside on this site. I attach newspaper article on this matter at Appendix MKA 7.

8. There remains a significant amount of undeveloped zoned industrial land at Maydown and to a lesser degree at Campsey. However, this industrial land is located on the Waterside a significant distance from the northern suburbs, there is no direct public transport links between here at Maydown and household car ownership levels are particularly low presenting significant accessibility barriers to Cityside residents accessing employment opportunities in these industrial estates.

#### **Analysis of Industrial Land Provision in Derry.**

- 2.4 This analysis of existing zoned industrial/employment land on the Cityside of Derry indicates that apart from the Skeoge Industrial Estate which is reserved for only Invest NI supported companies, there is little if any available or undeveloped industrial/employment land in close proximity to the recently developed major population centres (Shantallow, Galliagh, Ballymagoarty, Skeoge, Ballyarnet) of Derry on the northern periphery of the City.
- 2.5 The three existing industrial/business parks along the Bunrana Road (Elagh, Springtown and Pennyburn) are all full to capacity and there is little available or suitable land for economic or industrial development. Indeed, the Fort George SEDA which would have provided significant employment opportunities to this area has also been significantly reduced in scale due to the selling of a significant part of it for a health centre hub.

---

#### **Economic Disadvantage.**

- 2.6 It is also noted that these host Wards in the northern suburbs along the Skeoge are some of the most economically disadvantaged wards in Northern Ireland with high levels of unemployment, multiple deprivation and economically inactive residents. Provision of employment opportunities and land in close proximity to these Wards may go some way to addressing these economic disadvantages.

#### **New Housing Zonings – H1 and H2.**

- 2.7 H1 and H2 Housing Zonings are likely to be the primary focus for all new housing on the Cityside in the next fifteen years. H1 Zoning is located partially along Bunrana Road and in close to the proposed NEDA. H2 Zoning is also located adjacent to the proposed NEDA along the Coshquin Road. H2 is estimated to provide a further 2,565 dwellings and H1 is estimated to provide 2,310 dwellings to the proposed

housing stock of the City providing a total of 4,875 new dwellings in this area. These zonings, when fully developed, will provide another 12,675 people within this rapidly developing northern suburban area of the City. The provision of employment land and opportunities in close proximity to these new housing zonings will reduce the need to drive to work, provide a more sustainable walkable district with employment opportunities nearby easily accessible by walking, cycling or public transport creating a more “self-contained” neighbourhood.

### 3.0 Conclusions.

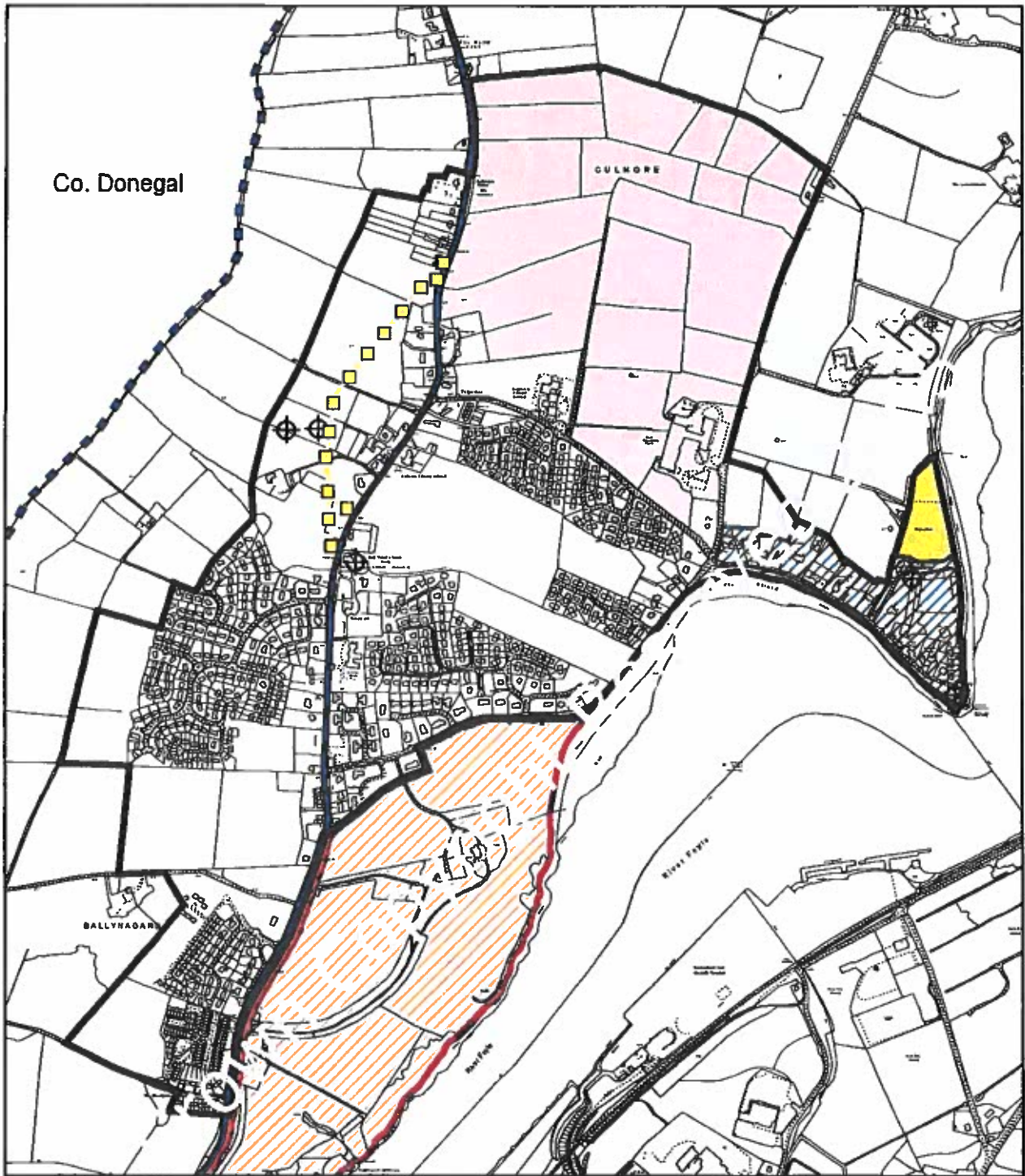
- 3.1 This representation supports the proposed specific change to the Draft LDP – PC41C. The representation also sets out substantial supporting information which justifies the proposed new Buncrana NEDA.
- 3.2 Our Client supports the proposed NEDA and believes it needs to be of sufficient scale to provide meaningful employment opportunities in this area of significant economic disadvantage, new housing development and population growth.
- 3.2 Our Client has identified undeveloped land of sixteen hectares along the Buncrana Road which is suitable for employment uses, is directly opposite Elagh Business Park and is in close proximity to new housing zonings - H1 and H2.








# Appendix MKA 1







MKA PLANNING LTD  
Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR,  
Tel: (028) 71 311551 Fax: (028) 71 313404



**Derry Area Plan 2011 - Culmore - Map SE 2**

-  Development Limit
-  District Boundary
-  Protected Route
-  Road Proposal
-  Site of Archaeological Interest

-  Green Belt
-  Area of Townscape Character
-  Lands zoned for industrial use
-  Lands zoned for recreation and open space use
-  Area of High Scenic Value
-  Area of Constraint on Minerals Development

0 100 200 300 400 Metres




This map is based on digital map data with the permission of Ordnance Survey for Northern Ireland on behalf of the Controller of Her Majesty's Stationary Office.

© Crown Copyright Reserved 1999



# Appendix MKA 2

MKA PLANNING LTD  
Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR,  
Tel: (028) 71 311551 Fax: (028) 71 313404



Key:

- Lands Zoned for Industrial Use
- Taken from OAP 2011 - Map 2 City Map

City drawings are for illustrative planning purposes only.

**MKA Planning Ltd.**  
Chartered Town Planners

Project Name	Part 15, Donerly	Date	15/01/2023
Project Number	15/01/2023	Scale	N:1:50
Author	J. O'Donnell	Checked	J. O'Donnell
Drawn	J. O'Donnell	Approved	J. O'Donnell



# Appendix MKA 3

MKA PLANNING LTD  
Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR,  
Tel: (028) 71 311551 Fax: (028) 71 313404



Republic of Ireland

- Planning History**
- LA11/01/000001/01**  
 Erection of 2 storey Data Centre building with ancillary offices and roof level plant area and screen fence, new access road, car parking, landscaping and site lighting, drainage and associated site and access works.

**LA11/01/000001/02**  
 Erection of 2 storey industrial building (class B2) with ancillary office accommodation, boundary fence, generator store, transformer station, smoking shelter, cycle shelter, car parking, landscaping and associated works.
  - LA11/01/000001/03**  
 Proposed Authorised Treatment Facility (ATF) for end of Life Vehicles (ELV).

**LA11/01/000001/04**  
 Development of phase 1 to consist of site works to be completed in preparation for the erection of a pair of framed buildings for the use as a repair unit and associated office. Phase 2 (at a later date) The second ground will require level to settle prior to the development of building works (Phase 2).
  - LA11/01/000001/05**  
 Erection of a pair of framed building, independent internally to receive & recycle burning & architectural waste for re-sale to the construct on industry & general public (Class B3).
  - LA11/01/000001/06**  
 Retention of door sales, shop and premises

**LA11/01/000001/07**  
 Retention of furniture restoration workshop floor incorporating lift ramp boom
  - LA11/01/000001/08**  
 The erection of 1No. Bus/Vehicle repair unit and associated office. Bus parking for 12No. Buses and car parking for 11 No. Cars

**LA11/01/000001/09**  
 Retention of change of use to children's recreational activity space and cafe area on new site adjacent from a furniture warehouse

**LA11/01/000001/10**  
 Change of use from warehouse of distribution to light industrial use; construction of new internal floor space at an upper level and alteration to the front elevation.
  - LA11/01/000001/11**  
 Change of use from vacant land to industrial use to storage and parking of cars including a 3 metre mesh fence surrounding the site
  - NI**

**Key:**

- Lands Zoned for Industrial Use
- Taken from DUP 2011 Map 1 City also

*Any drawings are for illustrative planning purposes only.*

**MKA Planning Ltd.**  
 Chartered Town Planners

Client	Maple Community	Date	Jan 2022
Project	High Forest Park, Londonderry	Scale	1:1,000
Author	1. MKA Planning Ltd. 2. MKA Planning Ltd. 3. MKA Planning Ltd.	Drawn	R. L. S.

# Appendix MKA 4

MKA PLANNING LTD  
Chartered Town Planners

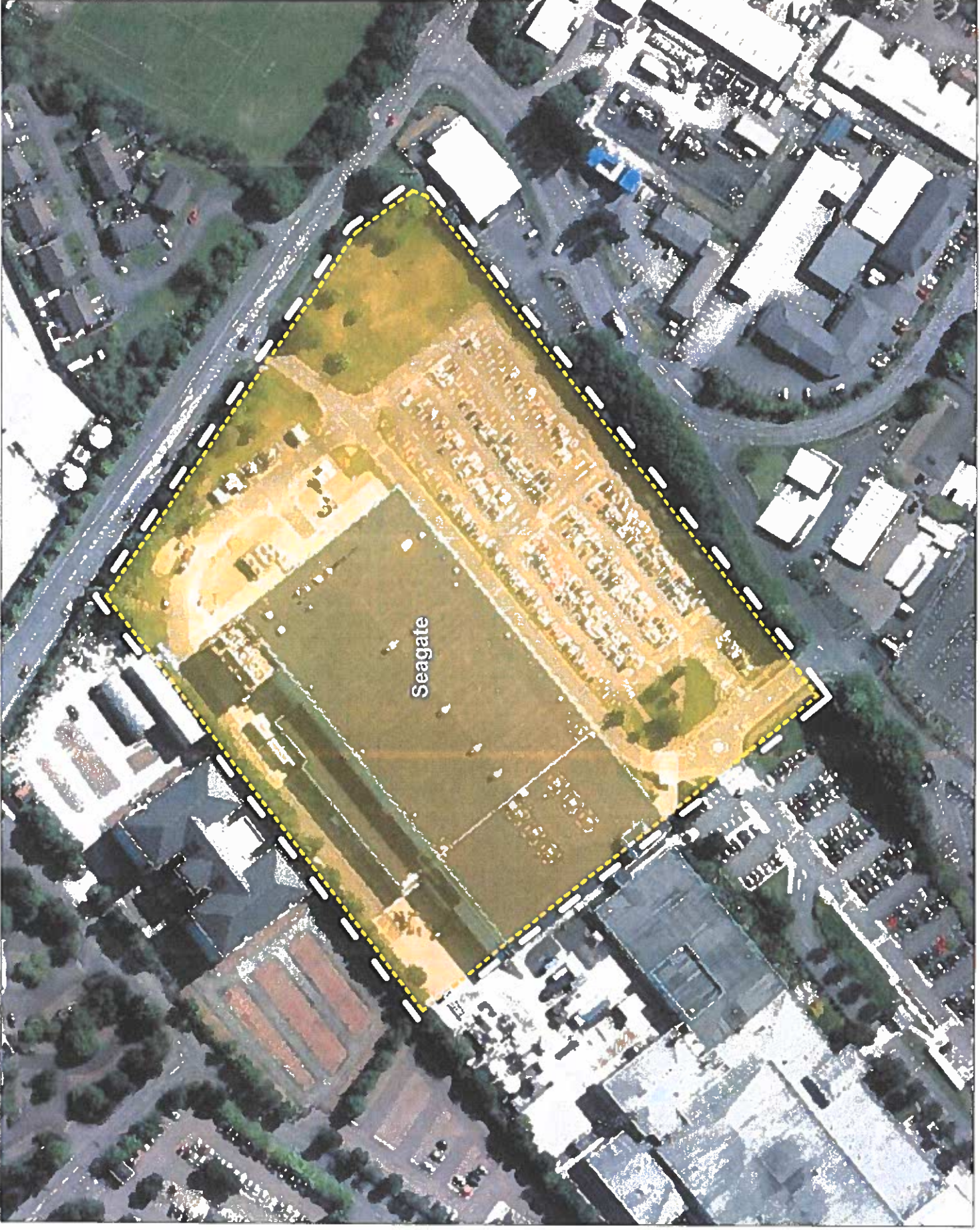
32 Clooney Terrace, Waterside, Derry, BT47 6AR,  
Tel: (028) 71 311551 Fax: (028) 71 313404



Key  
Lands Zoned for Industrial Use  
Taken from DAP 2011 - Map 2 City Map  
Any drawings are for illustrative planning purposes only

**MKA Planning Ltd**  
Chartered Town Planner

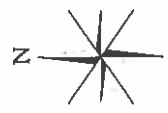
Project No.	PER/01/000000	Date	Jan 2012
Client	Springwood Mills & Lumber Co Ltd	Scale	1:1
Author	21/01/2012	Drawn	21/01/2012
Checked	21/01/2012	Approved	21/01/2012





AZ01/0829/F  
 Medical building (totaling 6,900 gross sqm) with  
 associated parking, health centre, hospital car  
 parking, 574 gross sqm, hospital car  
 parking, restaurant, soft service dining, fitness,  
 servicing and landscaping with access/egress via  
 Penryn Park and Penryn Industrial Estate  
 Road

Compass:

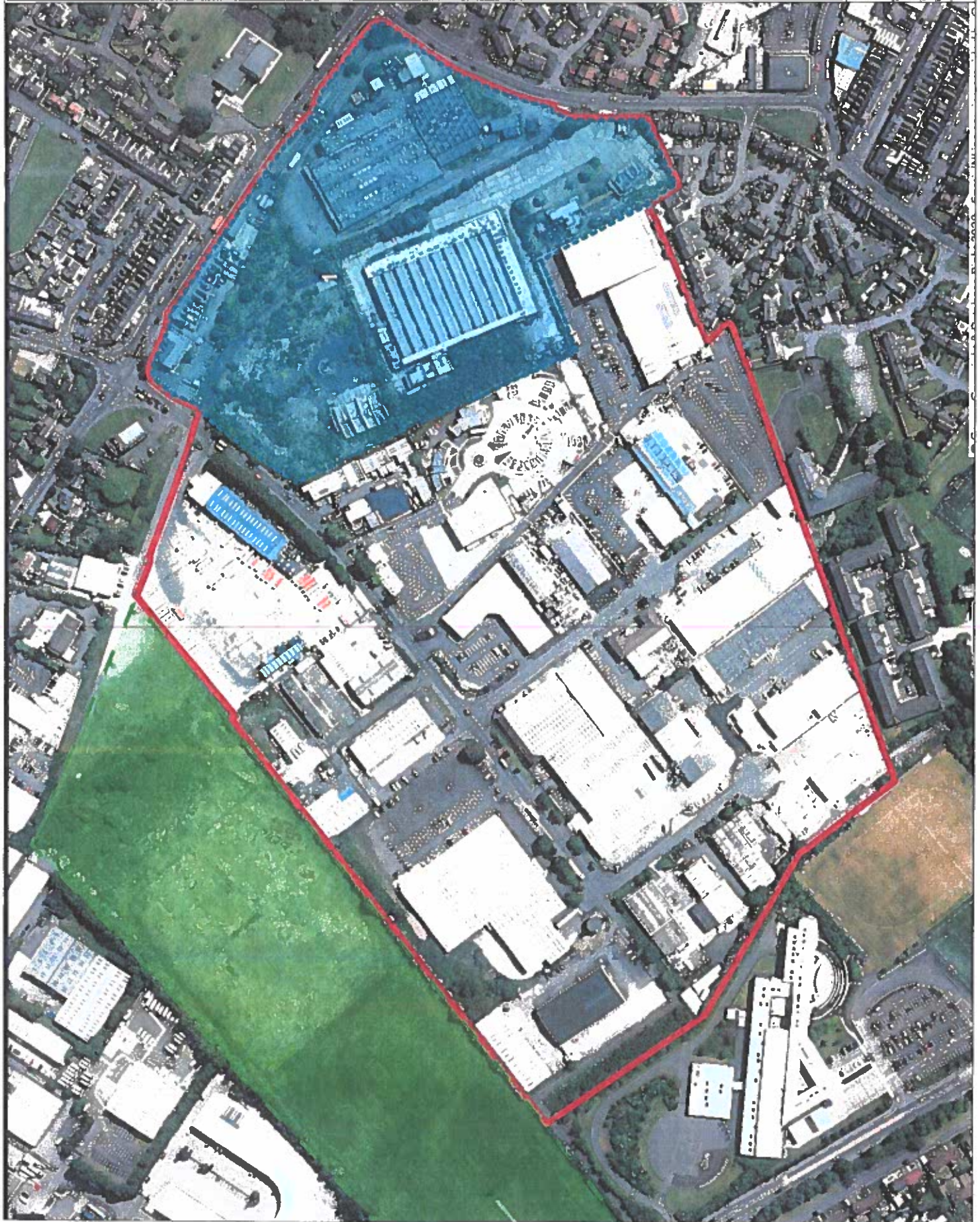


Key:  
 Penryn Industrial Estate  
 Zoned Greenzone

Any drawings are for illustrative planning purposes only.

**MKA Planning Ltd**  
 Chartered Town Planners

Client:	Penryn District Council	Date:	10/01/2024
Project:	Penryn Industrial Estate Phase 10A/4	Author:	AS
Address:	32 Greenway, Penryn, Cornwall TR24 0JY	Checker:	AS
Project No.:	2024/01/01	Scale:	1:1000



# Appendix MKA 6

MKA PLANNING LTD  
Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR,  
Tel: (028) 71 311551 Fax: (028) 71 313404



# Appendix MKA 7

**MKA PLANNING LTD**  
Chartered Town Planners

32 Clooney Terrace, Waterside, Derry, BT47 6AR,  
Tel: (028) 71 311551 Fax: (028) 71 313404



## Fort George regeneration programme

Topics: [Regeneration \(/topics/regeneration\)](#) , [Improving places \(/topics/urban-regeneration/improving-places\)](#)

The 11 acre Fort George site in Derry~Londonderry, a former military base, is owned by the Department and is situated on the west bank of the River Foyle. From circa 1970 the site had been used as a military base before it was returned by the Ministry of Defence (MOD) to the Port and Harbour Commissioners in 2001.

### On this page

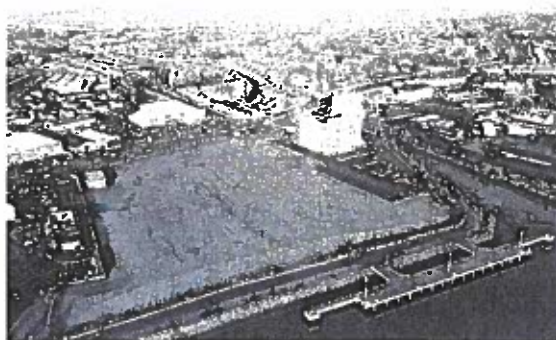
- [Remediation](#)
- [Development framework](#)
- [Catalyst Inc](#)
- [Expression of interest exercise](#)
- [Arup report](#)
- [Western Health Social Care Trust proposal](#)

In 2004 the Department acquired the site from the Port and Harbour Commissioners at a cost of £12 million with the benefit of certain indemnities in respect of possible land contamination.

### Remediation

The Department sought and received £3.2 million from the MOD towards the cost of decontamination in exchange for the formal release and legal cancellation of existing indemnities against MOD.

White Young Green environmental consultants were appointed in February 2012 to prepare a remediation strategy and then manage the contract.



<https://www.communities-ni.gov.uk/sites/default/files/styles/inline->

Subsequently, Deane Public Works were appointed to carry out capping and remediation works in 2018, and this work was completed in April 2019.

[expandable/public/images/communities/dfc-hurlgg-fort-george-aerial.JPG?itok=3XOzndCl](https://www.communities-ni.gov.uk/sites/default/files/styles/inline-expandable/public/images/communities/dfc-hurlgg-fort-george-aerial.JPG?itok=3XOzndCl)

Fort George Prime Riverfront Site,  
Riverside Walkway and Jetty

## Development framework

The Department received Outline Planning Permission for the Fort George Development framework in December 2015 for major mixed use development to include:

- residential
- office, employment & education uses (including research & development/call centre)
- community facilities
- retail
- cafes, bars and restaurants
- associated multi-storey and surface car parking.

The Fort George Development Framework was produced on behalf of the Department in 2014. This document is available on request by contacting the Department for Communities via email -[northwest.development@communities-ni.gov.uk](mailto:northwest.development@communities-ni.gov.uk) (<mailto:northwest.development@communities-ni.gov.uk>)

## Catalyst Inc

The Catalyst Inc (formerly North West Regional Science Park) building was opened in September 2014.

In order to accommodate the 50,000 sq. ft. building, the Department agreed to lease 1.1 acres of the Fort George site on a 125 year term. Catalyst Inc has plans to build a second building on the Fort George site and an application is currently with DfI Planning.

Catalyst Inc is an independent, not-for-profit organisation that houses innovators in an entrepreneurial setting which drives the knowledge economy in Northern Ireland by nurturing innovators and entrepreneurs to aim higher and succeed faster. It invests the



<https://www.communities-ni.gov.uk/sites/default/files/styles/inline-expandable/public/images/communities/dfc-hurlgg-fort-george-catalyst.jpg?itok=x8VFD3zK>

surplus generated from its property operations to provide the underwriting necessary for its community-led innovation ecosystem that supports over 900 start-ups, entrepreneurs and innovators each year to create and scale innovation companies in Northern Ireland.

Catalyst Inc., Fort George

## Expression of interest exercise

In 2018 the Department appointed a consultant to conduct an expression of interest exercise. This was not a formal marketing exercise but rather an information gathering exercise to find out what interest there was on the site.

Eleven expressions of interest were received. Although the Department is still open to all options, it is likely that a fuller marketing exercise will take place at some point.

## Arup report

In order to inform the Department's considerations on the best use for the site, Ove Arup and Partners Ltd (Arup) was appointed to provide strategic advice on the disposal and delivery options for Fort George.

The report includes a market analysis carried out by consultant, Lambert Smith Hampton, which assesses the level of private sector demand across a number of sectors including residential, office, retail, leisure and others.

- [Fort George Strategic Delivery Options Assessment \(/publications/fort-george-strategic-delivery-options-assessment\)](#)

## Western Health Social Care Trust proposal

Communities Minister Deirdre Hargey has agreed that Fort George can be the location of a new Health and Care Centre in Derry.

After the expression of interest exercise in 2018, the Department paused further marketing of the site in order to give the Western Health and Social Care Trust (WHST) time, given their status as another public sector entity, to develop their proposal and business case for a Health and Care Centre on the site. At this time, it is expected that the WHST proposal will utilise around half the site.

The development of a Cityside Health and Care Centre is anticipated to create 250 new permanent jobs as well as centralising approximately 450 posts in a modern state of the art facility. The positions will include nursing, social work, allied health professional and administrative roles as well as the relocation of a number of GP surgeries.

The WHSCT's Business Case for a Cityside Health and Care Centre has received DoF and DoH approval to purchase the required site on Fort George. A Heads of Agreement will be signed with WHSCT to agree in principle the disposal of part of the site.

The Department has commenced work to revise the existing Fort George masterplan. This revised masterplan will determine the location of the Health and Care Centre on the site and will also provide further clarity in relation to further potential development opportunities for the wider site in the future.

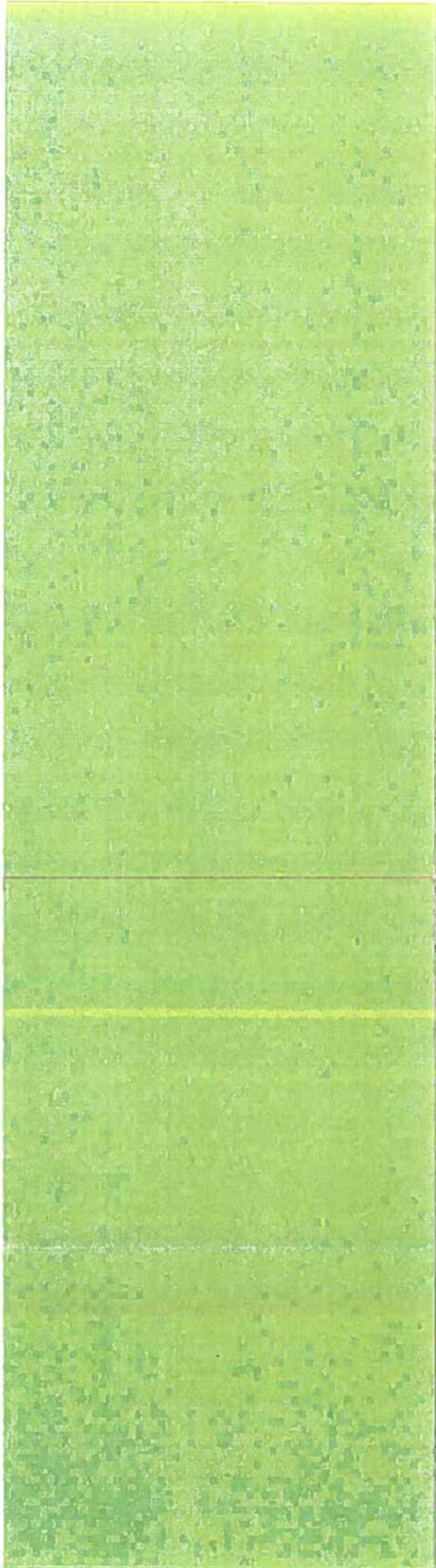
## Related articles

- [A Bolder Vision for Belfast - reimagining our city centre \(/articles/bolder-vision-belfast-reimagining-our-city-centre\)](/articles/bolder-vision-belfast-reimagining-our-city-centre)
- [Comprehensive development schemes \(/articles/comprehensive-development-schemes\)](/articles/comprehensive-development-schemes)
- [Development briefs \(/articles/development-briefs\)](/articles/development-briefs)
- [EU Peace III Programme \(/articles/eu-peace-iii-programme\)](/articles/eu-peace-iii-programme)
- [EU Peace IV Programme \(/articles/eu-programmes\)](/articles/eu-programmes)
- [Former New Town Lands \(/articles/former-new-town-lands\)](/articles/former-new-town-lands)
- [Irish Street Downpatrick development scheme \(/articles/irish-street-downpatrick-development-scheme\)](/articles/irish-street-downpatrick-development-scheme)
- [Portrush Regeneration Programme \(/articles/portrush-regeneration-programme\)](/articles/portrush-regeneration-programme)
- [Public realm / environmental improvement \(/articles/public-realm-environmental-improvement\)](/articles/public-realm-environmental-improvement)

More related articles







**RTPI**

mediation of space · making of place

© 2021 This document is copyright reserved and remains the property of MKA Planning Ltd.

