

Preferred Options Paper: Final Report on Representations Received



Derry City and Strabane District Council Local Development Plan (LDP) 2032
Preferred Options Paper (POP)
Final Report on Representations Received
December 2019



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1.0 Introduction

1.1 The Local Development Plan (LDP)

The purpose of the Local Development Plan (LDP) is to inform the general public, statutory authorities, developers and other interested parties of the policy framework and land use proposals that will guide development decisions within the District. The LDP is expected to apply regional policies at the appropriate local level and set out a clear vision of how the District should look in the future, by indicating what type and scale of development should be encouraged and where it should be located. The Plan's land-use zonings, designations and Planning policies will ensure that lands are sustainably zoned, development is managed and that infrastructure is co-ordinated to develop the District for future generations.

1.2 When adopted, the Council's LDP for the District will replace the current Derry Area Plan 2011 (adopted May 2000) and the Strabane Area Plan 2001 (adopted April 1991), both of which were produced by the Department of the Environment (DOE). The new LDP will also replace most existing regional planning policies. The LDP will comprise of two development plan documents:

- The Plan Strategy (PS); and
- The Local Policies Plan (LPP).

Our LDP has been prepared within the context of the Council's Community Plan, the Strategic Growth Plan (SGP), and the wider policy hierarchy and context operating at international, national and regional levels. In addition, there are various other iterative assessments and appraisals that were undertaken in accordance with legislative requirements. The required adherence to these will be tested at the LDP's future Independent Examinations to ensure 'soundness'.

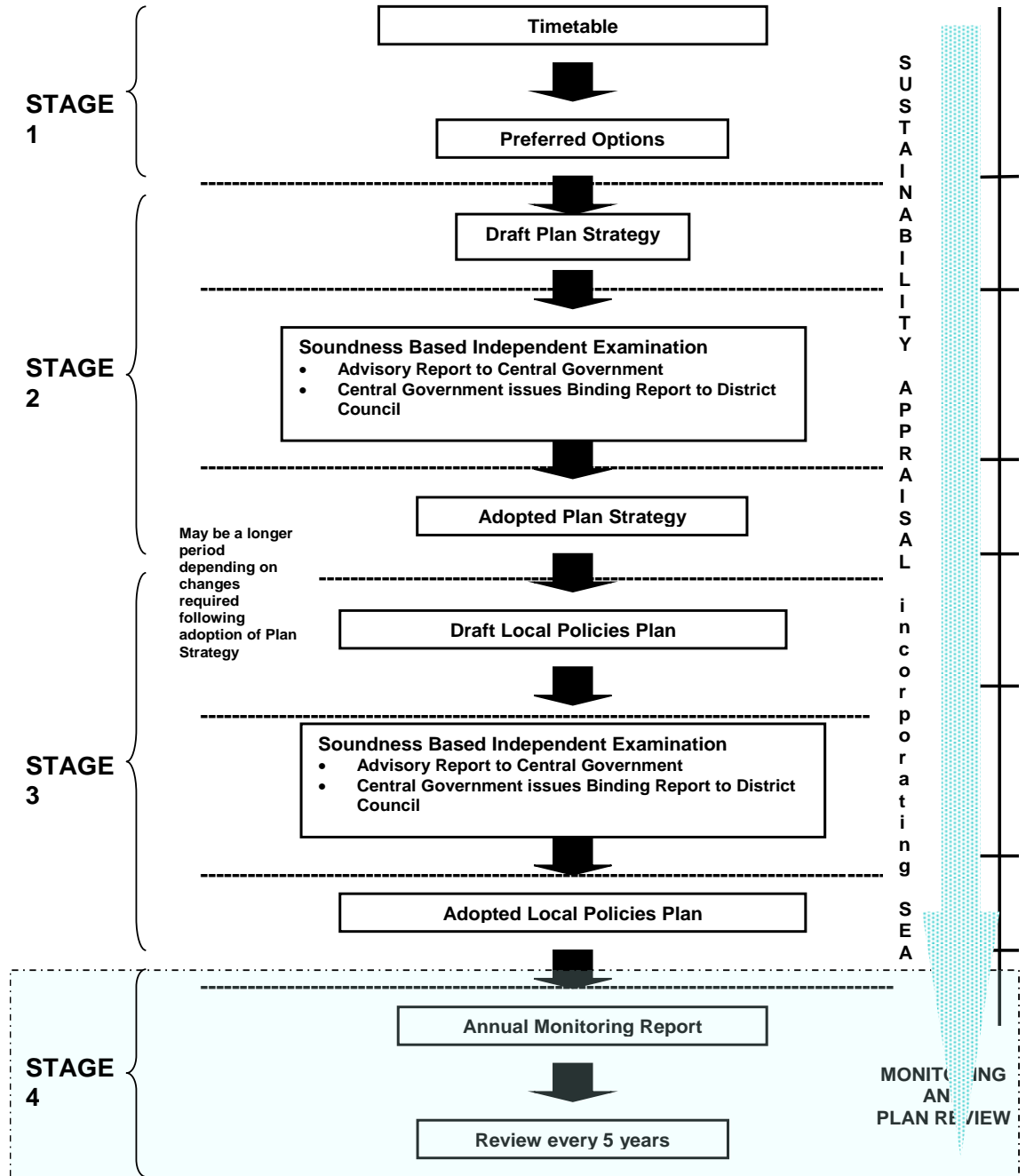
1.3 Public participation and engagement in formulating the LDP and progress through to adoption is facilitated through a Statement of Community Involvement (SCI) and Timetable, which was agreed between the Council and the Department for Infrastructure (DfI), see <http://www.derrystrabane.com/Subsites/LDP/Local-Development-Plan>. Additional engagement was enabled through the Council's participation in the EU funded IMPROVE project. Details on this project can be found in Section 4 – paragraph 4.6).

1.4 The Plan Strategy is prepared first and subjected to public consultation and Independent Examination before adoption. Public consultation for the draft Plan Strategy, which this report accompanies, runs from 2nd December 2019 to 27th January 2020. After the Plan Strategy has been adopted, the Local Policies Plan will be prepared and also subjected to public consultation and Independent Examination before adoption.

1.5 In summary, the LDP for Derry City and Strabane District performs the following functions:

- provide a 15-year plan framework to support the economic and social needs of the District in line with regional strategies and policies, while providing for the delivery of sustainable development;
- facilitate sustainable growth by co-ordinating public and private investment to encourage development where it can be of most benefit to the well-being of the community;
- allocate sufficient land to meet society's needs;
- provide an opportunity for all stakeholders, including the public, to have a say about where and how development within their local area should take place;
- provide a 'plan-led' framework for rational and consistent decision-making by the public, private and community sectors and those affected by development proposals; and
- deliver the spatial aspects of the Council's recent Community Plan – the Strategic Growth Plan for Derry City and Strabane District (SGP).

Figure 1: The Process for Preparing a Local Development Plan (LDP)



1.6 The Interim Representations Report, following publication of the Preferred Options Paper (POP), and the Final Representations Report.

- 1.7 Derry City and Strabane District Council published the Preferred Options Paper (POP) on 31st May 2017 and held a 12 week consultation period over summer 2017. This time scale is in line with Regulation 11(3) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, which states that the consultation period 'must be a period of not less than 8 weeks or more than 12 weeks'. 127 representations were received during the consultation period. The POP was the first formal consultation stage and an important step in the preparation of the Council's LDP for Derry City and Strabane District (see Figure 1). The POP provided the basis for consulting with the public and stakeholders on a series of options for dealing with key issues in the Plan area. It set out the Council's initial proposals and policy direction, aiming to stimulate public comment and help interested parties to become involved in a more meaningful way at the earliest stage of Plan preparation. The POP did not cover every aspect, issue and policy that is included in the LDP draft Plan Strategy (dPS) but instead sought to identify and address the main Planning issues that make up the LDP dPS.
- 1.8 This final Representations Report has been prepared in compliance with Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015 which requires a council to take account of any representations made on the POP before it prepares the LDP Plan Strategy. It follows and builds upon the previously published Interim POP Representation Report which was prepared to provide Elected Members, the community and all those who provided representations with a summary of the key issues raised in response to the Council's LDP Preferred Options Paper at an early stage. This early engagement also strengthened the evidence base and helped to enhance the 'soundness' of the LDP dPS.
- 1.9 In line with our published Statement of Community Involvement, this Final Representations Report is now published with the draft Plan Strategy to advise how the Council has taken the representations into account in the preparation of the Derry City and Strabane District LDP. The Council has also undertaken further clarification meetings and engagement with relevant consultation bodies to inform the preparation of the draft Plan Strategy.
- 1.10 A number of key documents were produced and published in tandem with the Preferred Options Paper, in particular an interim Sustainability Appraisal (SA), which incorporated the legislatively required Strategic Environmental Assessment (SEA). An interim Habitats Regulations Assessment and initial baseline / assessment reports on Equality Impact Assessment (EQIA) and Rural Needs Impact Assessment (RNIA) were also published. These, too, have been progressed to their full and final versions in respect of the Plan Strategy element of the LDP.

2.0 Purpose of the Interim POP Representation Report

- 2.1 The purpose of the Final POP Representation Report is to summarise the key issues arising from the public consultation exercise and to inform the preparation of the LDP.

- 2.2 In doing so, the report has assisted the Council towards meeting its statutory obligation to take account of all representations made and demonstrate soundness. The report demonstrates that the points raised have been fully considered and accounted for. Finally, it will play an important role in supporting the development of subsequent stages of the LDP.

3.0 Consultation Process

3.1 The public consultation ran for 12 weeks from 31st May – 22nd August 2017, in accordance with the Planning (Local Development Plan) Regulations (Northern Ireland) 2015. The POP consultation and engagement took many forms in an effort to reach a wide audience. Methods of consultation included public engagement events, advertisements and web-based consultation. A varied approach to engagement was taken to ensure that the consultation was widely accessible. These are summarised below:

Consultation Launch Event

3.2 The Launch event took place on the 30 May 2017 in The Guildhall, Derry. This launch event was attended by the Mayor of the City and District, the Chair of the Planning Committee, other elected Members, Council Chief Executive, Directors, Head of Planning, statutory consultees, other council officials and representatives from adjoining council areas. This level of attendance demonstrates the widespread commitment to the LDP and the links to the Strategic Growth Plan.

Public Notice in Local Newspapers

3.3 In accordance with the Council's Statement of Community Involvement and the Planning (Local Development Plan) Regulations (Northern Ireland) 2015, the Preferred Options Paper Consultation was advertised, on 2 consecutive weeks, in the local media namely The Derry Journal, Londonderry Sentinel, Strabane Chronicle, Strabane Weekly News, Tyrone Constitution and Ulster Herald.

Website

3.4 Derry City and Strabane District Council's (DCSDC) website featured a link to the Preferred Options Paper together with links to the Paper and all other relevant documents. Screenshots from the website published on the Council's website can be found in the Appendix. Contact details for further information were also provided. A link to an online questionnaire was also made available on the Council's website, providing an easy and structured way for views to be submitted. Email and postal submissions were also welcomed and details of both methods of submission were outlined on the Local Development Plan page of the website and within the POP document.

Social Media

3.5 Social media was also used to widely communicate the POP and encourage local people to consider feedback. The social media activity included Facebook, Twitter and Radio Foyle highlighting specific aspects of the POP.

Display Exhibitions

3.6 POP display exhibitions were set up at the Council's two main buildings, 98 Strand Road, Derry and Derry Road, Strabane. These displays made available hard copies of the POP, summary booklets along with all other relevant POP documentation including copies of the POP Evidence base papers, the EQIA document, Rural Proofing Document and the Sustainability Appraisal documents for reference purposes.

POP Document and Summary Booklets

3.7 Hard copies of the POP were also made available in public buildings Council-wide, Libraries, Leisure Centres, other NI Government Offices, Neighbourhood Renewal Organisations, Civic Offices, Cultural Venues, Health Centres, Shops and Restaurants in Derry, Strabane, Newtownstewart, Castlederg, Sion Mills, Claudy and Eglinton. Summary booklets were also designed and published to give a broad overview of the information within the POP in a shorter, simpler and easier to read format. For consistency and recognition, the summary booklets were of a similar branding to the original POP document.

Public Engagement Events

3.8 A series of 16 consultation events as detailed below were also 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, with consistent and clear messages being communicated. A summary of the issues raised is set out in the previously published POP Summary List of Issues Raised Report.

Location	Evening Meeting (LDP & SGP - Strategic Growth Plan)	Daytime Workshop (focussed on LDP, as well as SGP)
Guildhall, Derry	Tues 6th June @ 7pm	Wed 7th June, 2pm - 4pm
Alley Theatre, Strabane	Wed 7th June @ 7pm	Fri 9th June, 2pm - 4pm
Ulster University @ Magee, Great Hall	Tues 13th June @ 7pm	
The Glen Community Centre, Derry		Thurs 15th June, 3pm - 5pm
Claudy Community Centre	Thurs 15th June @ 7pm	Fri 16th June, 2pm - 4pm
Derg Valley Leisure Centre, Castlederg	Mon 19th June @ 7pm	Tues 20th June, 11.15am - 1pm
Amnity House Donemana	Tues 20th June @ 7pm	Wed 21st June, 2pm - 4pm
Skeoge House, Leafair, Derry	Thurs 22nd June @ 7pm	Fri 23rd June, 2pm - 4pm
St. Columb's Park House, Derry	Tues 27th June @ 7pm	Wed 28th June, 2pm - 4pm

Statutory Consultations

3.9 It is a statutory requirement under Regulation 9 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015, that the Council consults a number of consultation bodies. The Council issued correspondence by email to all Statutory Consultees, as well as identified non-statutory bodies, including:

- Northern Ireland Government Departments
- Adjoining Councils
- Water or Sewerage Undertakers
- The Northern Ireland Housing Executive
- The Civil Aviation Authority
- Electronic Communications Code operators
- Electricity operators
- Gas operators
- Londonderry Port and Harbour Commissioners

- Invest NI
- Translink
- City of Derry Airport
- Belfast International Airport
- Loughs Agency

Section 75

3.10 Section 75 of the Northern Ireland Act 1998, Equality of Opportunity places a statutory requirement on each public authority to:

Carry out their functions with due regard to the need to promote equality of opportunity:

- between persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation;
- between men and women generally;
- between persons with a disability and persons without; and
- between persons with dependants and persons without.

Without prejudice to its obligation under subsection 1, a public authority shall, in carrying out its functions relating to Northern Ireland, have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

3.11 Section 75 groups were identified through the Council's database in order to fulfil its statutory obligations and were sent a letter advising them of the POP and the importance of their contribution to the POP and how they could respond. A list of those notified is attached in the Appendix. We will continue to work with the Section 75 Groups and we begin to form proposals for the Plan Strategy.

4.0 Consultation Responses

Representations

4.1 In total there were 129 responses or ‘representations’ to the POP and these are broken down into the following tables:

Type of Respondee:

Origin of Response	Number of Responses
Consultees	23
Elected Representatives	3
Organisations	22
Agents / Individuals	77
Late Responses	4
Total	129

4.2 Nature of Response

Nature of Response	Number
Questionnaire	26
Hard Copy or email	103

4.3 The following responses from Main Statutory and non-Statutory Consultees (Consultation Bodies) were received:

Name/Organisation	Response to POP
Department of Infrastructure	Yes
Historic Environments Division, Department for Communities	Yes
Historic Monuments Division, Department for Communities	Yes
Geological Survey NI/ Minerals, Department for Economy	Yes
North West Development Office, Department for Communities	Yes
Natural Environment Division, DAERA	Yes
Forestry Service, DAERA	Yes
Department of Education	No
Department of Justice	No
Loughs Agency	Yes
Londonderry Port and Harbour	Yes
Invest NI	Yes
Mid Ulster District Council	Yes
Causeway Coast and Glens Borough Council	Yes
Fermanagh and Omagh District Council	Yes
NI Water	Yes
NIHE	Yes
SSE Electricity	Yes
City of Derry Airport	Yes
(RES) Renewable Energy Systems	Yes
Brookfield Renewables	Yes
Gaelectric	Yes

4.4 The following is the full List of the Representations received from Statutory Consultees, Planning Agents, Organisations and Members of the Public:

Historic Environment Division, Dept for Communities	Geological Survey NI/Minerals, Dept for Economy	Mid Ulster District Council
Fermanagh and Omagh District Council	NI Water	North West Development Office, Dept for Communities
Historic Monuments Council, Dept for Communities	Natural Environment Division, DAERA	DAERA – Forestry Service
Loughs Agency	Invest NI	Dept for Infrastructure
Causeway Coast and Glens Borough Council	SSE Electricity	City of Derry Airport
(RES)Renewable Energy Systems	Brookfield Renewables	Gaelectric
NIHE	Cllr David Ramsey	Mark H Durkan MLA
Cllr Dan Kelly	Slaughtmanus Conservation Group	Foyleside Shopping Centre
NI Renewables Industry Group	Friends of the Derry Walls	The Wee Greenway Initiative
QPANI (Quarry Producers)	Glen Development Initiative	Foyle Civic Trust
Londonderry YMCA	Woodland Trust	Translink
Enagh Youth Forum	Outer North Neighbourhood Partnership	Bryson Energy
Inner City Trust	River Faughan Anglers	RSPB
Retail NI	Cycle Derry	Invest in the West
Glenmornan Community Association	NI Environmental Link	TC Town Planning
Inaltus Planning	Paul McGarvey Architect on behalf of James McDermott	ACA Architecture
Inaltus on behalf of Kennedy Retail Park, Strabane	Paul McGarvey Architect on behalf of Diarmuid Gallagher	Paul McGarvey
Paul McGarvey on behalf of several landowners	AQB Architecture	Strategic Planning on behalf of John Black
TSA Planning	Seamus Canavan on behalf of DW Consulting Ltd	Fleming Mountstephen Planning on behalf of Henderson Group
TSA Planning on behalf of Genova NW Ltd	MBA Planning on behalf of Riveridge Recycling	MBA Planning
Mark Houston Design on behalf of Niall Devine, N&R Group	Rock Architecture	Mary Kerrigan Consulting

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Bond Architects	Canavan Associates on behalf of R McLaughlin, L McLaughlin, N McKeague & S Morgan	Lee Kennedy on behalf of McCormick Builders Ltd
Lee Kennedy on behalf of Messers McGlinchy, McDuff and McDaid	Brendan Johns on behalf of Mr G Sayers	MKA Planning on behalf of Mr and Mrs Paddy Cosgrove
MKA Planning on behalf of Kevin Watson	JPE Planning on behalf of BW Homes and Construction Ltd and Braidwater Ltd	David Dalzell
Futurescape Planning	Strategic Planning on behalf of Mr JP McGinnis	Strategic Planning on behalf of Mr John Killen and Mr Clarke Killen
Strategic Planning on behalf of Mr Derek McFeely	Strategic Planning on behalf of Mr Gerard Heaney	Strategic Planning on behalf of Londonderry Port and Harbour Commission
Strategic Planning on behalf of Mr Black	Turley Associates on behalf of Dalradian Gold Ltd	Turley Associates on behalf of Consortium of Landowners Investors, Developers and Investors re Housing
Turley Associates on behalf of Mr Gabriel Dolan	Turley Associates on behalf of Mr Ernie Lusby	Turley Associates on behalf of parties with an interest in Bay Road
Turley Associates on behalf of Mr John Burns	Turley Associates on behalf of Magim Ltd	Turley Associates on behalf of Hartlands Ltd
Turley Associates on behalf of Heron Brothers	Shauna Cathcart	Gerald Roarty
Danny Rafferty	Mark Foley	Brian O'Connor
Colm Duffy	Darren Currie	Mary Casey
Padraigin Nímhaonaigh	David Young	David Young
Aidan Devine	Eamon Caldwell	Teresa Donnelly
Gerard Harkin	John Duffy	Fintan Hughes
Myles Donnelly	Michael Donnelly	Nigel McGillian
Joe McLaughlin	Thomas McCallion	Peter McCarron
Andrew Ryan TLT Solicitors on behalf Mr and Mrs Mullan	Jane Grant	Raymond Kee
Colm Cavanagh	Maria Bonner	Barbara Curran
Connall Sweeney	James Elliott/Niall McAteer	Michael Savage
Kevin McConnell	Eileen Walsh	Pennisula Group
Garavan O'Doherty	Laura McCausland	John Toland
Bart O'Donnell on behalf of Boomhall Estate	Peter McCarron	

- 4.5 The representations received were summarised into issues raised and all entered into a representations database. A report listing all those summaries by representation was prepared and was published on the Council website along with the Interim POP Representations Report. A summary of the issues raised at the LDP POP and Strategic Growth Plan Consultation Events held in June were presented with the Representations List report. A key feature of the LDP preparation system is that the consideration is to be 'issue-based' and accordingly, all representations were sorted into the issues raised, rather than being considered by individual representation. These issues were presented in the Interim Report and have also been included in this Final Report. They were sorted into the same structure/topic headings as were set out in the POP document i.e. by Vision and Objectives, then Spatial Strategy, then Economy topics, Social, Environmental etc. All issues raised in the representations have been taken account of in the draft Plan Strategy, having been considered by Planning officials and elected Members of the Council. Section 6 of this Final Report sets out the outcomes of this consideration.
- 4.6 Derry City and Strabane District Council has initiated a new programme of enhanced public consultation and involvement called 'IMPROVE'. This is an EU funded project by the Northern Periphery and Arctic 2014-2020 programme which aims to facilitate the public in helping the Council produce better public services in this District. The benefits apply when public participation is a two-way process - where both the public and the Council can learn and gain benefit. Effective public participation allows the public's opinions to be identified and incorporated into decisions that ultimately affect them. As part of this citizen engagement and to make the LDP process more accessible to a wider audience a questionnaire was published on the LDP section of the Council's website. A series of questions about each preferred option was posed and there were comment boxes to provide an answer. This gave the public an opportunity to respond to any specific options of the POP without having to send in an email or letter. In total there were 26 responses received and a variety of responses were summarised in the LDP POP Representations Summary List that accompanies this report.
- 4.7 A series of 16 consultation events were held across the City and District during June 2017. A summary of the issues raised will also be published along with the POP Representations Report and the List of Representations Summary Report. These were held during daytime and evening to encourage a wide participation, including carers, those with dependents and those in full time employment. Many of these issues were followed up with a more detailed letter or questionnaire response and the issues raised will be taken into consideration as we go forward towards the Plan Strategy.

5.0 POP Representations, Consideration and Response

This section contains the LDP consideration of and response to the issues raised by the POP representations from the Interim Representations Report. It is laid out in an identical format to that used in the POP document for the reader's convenience. The issues raised by all the representations were summarised and a brief consideration and broad approach for the LDP going forward from POP stage to dPS stage was provided at the end of each topic. Council's preferred option, as set out in the POP, was shaded within each Topic table. The final consideration and response is set out in Section 6.0 of this paper.

5.1 LDP VISION AND OBJECTIVES

- While broad support has been shown for the vision and objectives, it is felt that consideration should be given to developing a bespoke LDP vision which draws upon the Community Plan and which is more locally distinct and land-orientated.
- The vision needs to demonstrate how the economic, social and environmental aspects can be integrated to further sustainable development.

Economic Objectives

(a) Creating Jobs and Promoting Prosperity

Issues Raised – Economic Objectives

- Classification of social, economic and environmental objectives are supported but rationale for classification is not always clear.
- The delivery of sections of the A5 and A6 may be inhibited by a number of potential constraints.
- Support for overarching economic objective of creating jobs and promoting prosperity.
- Support for objectives to maximise the economic corridor/A5 linkages and potential benefits for Strabane given its border location.
- The creation of 15,000 job is considered too ambitious. Conversely, support is shown for the creation of 18,000 job.
- Number of objectives should be reduced and made more concise and easier to monitor.
- Economic objectives must not limit the opportunities for the establishment, growth and expansion of rural businesses based in rural locations.
- Business 'Start-Ups' and 'Homeworking' are crucial in contributing to rural economies and policies need to be suitably tailored to support small-scale enterprise.
- Support for 'Knowledge Based' industries to be located close to the City Centre, Fort George and Ebrington.

Social Development Objectives

(b) Accommodating People and Facilitating Communities

Issues Raised – Social Development Objectives

- Focus needs to be on the City Centre as the Gateway for the North-West.
- Support for 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 development objectives should include the designation/zoning/provision of lands for housing in Strabane and smaller settlements.
- 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.
- 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.
- Need to ensure that social development objective (iii) does not negatively impact on the Councils Vision for a district which provides *'equality of opportunity for all'*.
- Need for physically integrated interconnected residential land.
- The provision of 12,000 new homes is considered too conservative.
- Housing needs to be focused on suitable sites that makes a meaningful contribution.
- No acknowledgement of the positive impact that transport choices can have upon people's health and wellbeing.
- Council needs to develop an ambitious plan for low carbon urban areas which will deliver economic, environmental and health benefits.

Environment Objectives

(c) Enhancing the Environment, Creating Places and Improving Infrastructure

Issues Raised – Environment Objectives

- 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.
- Environment should seek to 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, maximisation of transport modes and reduce travel times.

- Built heritage contributes to growth and vitality through sympathetic restoration providing for a range of economic uses such as office / workspace provision.
- LDP needs to recognise that onshore wind energy development can meet climate change obligations under POP environmental objectives. It is a more cost effective and deliverable technology.
- Future development and growth of CODA should be considered in the LDP.
- 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.
- A more explicit stance needs to be taken in terms of the responsibilities towards the Sperrins Area of Outstanding Natural Beauty. Environment Objective (viii) fails to explicitly reference the AONB while explicitly referencing Derry City.
- The 'traditional approach' identified and promoted at 4.5 to advance the outlined objectives has failed to protect the district from windfarm blight.
- Perception that car ownership is being prioritised 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 commitment to protect and enhance the natural and built environment is supported and the Plan Strategy needs to afford the same level of protection to environmental assets, such as ancient woodland given its scarcity.
- The value of wooded areas needs to recognise the wider benefits and be reflected in future policy.
- 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 housing lands will be made up of social housing in future.
- Skeoge needs to be more sustainable.
- Concerns about the disadvantage and deprivation of social housing in the future.
- Pedestrianisation of the Walled City should be explored as a transformational tourism/economic initiative for the city and district.
- Failure to include a sufficiently firm commitment to securing modal shift through strengthening and broadening the appeal of public transport, walking and cycling.
It will therefore fail to secure significant modal shift.

Consideration and Going Forward - Vision and Objectives

Overall Support for the stated Vision and Objectives. Council will take account of all the issues raised before finalising the draft Plan Strategy (PS). There is also merit in a bespoke LDP Vision, which is more spatial and locally distinctive.

5.2 GROWTH STRATEGY FOR DERRY CITY AND STRABANE DISTRICT

Overall Growth Strategy for Derry City & Strabane District	Option 1 – Current Projections	Option 2 – Planned Growth	Option 3 – Potential Optimum as a City Region
Population	149 -152k	155 - 160k	160 - 170k
Jobs	+ 4k	+ 8-15k	+ 16-18k
Homes	+ 6.5k	+ 7-12k	+12-16k

Issues Raised – Growth Strategy

- Brexit will have a negative impact on growth.
- Support for target levels for population growth, additional jobs and new homes.
- Disjoint between para 5.3 (modest pop growth) and later evidence in support of preferred option.
- DFI consider that the growth strategy for the LDP should be more clearly linked with the Draft Strategic Growth Plan.
- 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.
- Spatial Growth Strategy potential to promote environmentally and people friendly environments aligning with PfG targets.
- There's a need to identify suitable homes to attract people back into Council area who have moved to Donegal.
- Need to create economic opportunities to drive growth.
- Proper mitigations need to be inbuilt to ensure consistent growth across the District and not allowing gravitational forces to concentrate growth in the city.
- Achieving many of the social, economic and economic objectives will be dependent on the availability of local and responsibly sourced minerals and aggregates.
- Preferred Option is 'largely' based on 2008 NISRA projections which are outdated.
- Growth scenarios should be subject to SA.
- Adequate protection must be put in place prior to progressing the growth strategy to ensure a balance between the three strands of the Plan.
- Need to invest to grow the circular economy in line with the proposed move towards zero waste for the city and region.
- Development is not inherently sustainable and only becomes so, if it incorporates environmental and social considerations.
- 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.
- The LDP Growth Strategy must give cognisance to eco-system services.
- Difficult to reconcile the sustainable need for growth/numbers of new homes proposed in Option 2 based on supporting data.
- Need for a more restrained 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.
- Limits to the growth strategy needs to be removed – encourage growth and positive action.
- While strong support shown for Option 3 as the preferred option is considered to be conservative.
- 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.
- Clarification needed on how this cross-jurisdictional planning concept will work out in practice.
- Develop and strengthen role as the NW City Regional Hub location.
- LDP needs to take a 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.
- Concern at the paucity of a bold and ambitious approach to the Growth Strategy.
- University expansion and student numbers increase will be essential.

Consideration and Going Forward - Growth Strategy

While the spectrum of attitudes was not unexpected, there was general support for the Preferred Option. Brexit concerns figure in a number of responses, as do representations seeking higher housing targets. Issues raised on the quality and nature of underpinning data are particularly significant in terms of soundness. Site / settlement specific issues that were submitted will be considered at the Local Policies Plan (LPP) stage. Council will consider all points raised before finalising.

5.3 SPATIAL STRATEGY FOR DERRY CITY AND STRABANE DISTRICT

	Option 1	Option 2	Option 3
Overall Spatial Distribution	Focus on Derry City as a Regional City, as well as Strabane Town as a Main Hub as set out in RDS 2035	Proportionate Growth across all Settlements and Countryside	Balanced Growth – focus on Derry City as a Regional City, as well as Strabane Town as a Main Hub plus other opportunities in the rural settlements and countryside

Issues Raised – Spatial Distribution

- Options presented are limited and lacking in detail.
- Option 2 does not articulate the need for further opportunities in the Countryside.
- Option 2 would not support the RDS objective to grow population of hubs and hub clusters.
- Support for Option 1 which places a focus on Derry City as the Regional City and Strabane as the main hub.
- Support for balanced growth across the District.
- Proposed growth figures are too restrictive.
- Planning needs to be simplified for countryside.
- Support for Option 3 of Spatial Strategy.
- The Spatial Strategy requires much further consideration during the subsequent plan
- Adherence to RDS and SPPS.

Consideration in Going Forward – Spatial Distribution

While the spectrum of attitudes was not unexpected, there was general support for the Preferred Option 3, caveated with a desire for additional supporting evidence. Council will consider all points before finalising.

	Option 1	Option 2	Option 3
Specifics of Settlement Hierarchy	Existing Settlements retained 49	Rationalise Upper Tiers – Derry, Strabane, Local Towns. Re-designate some Villages and Small Settlements, including some new settlement designations	

Issues Raised – Settlement Hierarchy

- Support for rationalising upper tiers.
- Eglinton should be reclassified as a small town.
- Support for Strabane as a main supporting town.
- There should be detailed consideration of the needs of Drumahoe as a secondary nodal point.
- Support for the spatial strategy where Derry is recognised as the Principal City within the context of a North West Cross Border Region.
- Support for strengthening role of Derry and growing population of hubs in order to counter disproportionate amount of growth in smaller settlements in recent years.
- Support for Strathfoyle remaining as a village settlement.
- Support to reclassify Glenmornan and Cranagh as village settlements.
- Support for Nixon's Corner to be classified as a village settlement.
- Support for Gortnessy to be brought within small settlement designation.
- Craigtown should be considered as a village settlement.
- Sion Mills should be retained as a Village.
- Reclassification of Eglinton will increase the need for more development.
- Support for Claudy remaining as a village.
- Council needs to ensure that the assessment of Claudy supports its designation as a Local Town.

Consideration and Going Forward - Settlement Hierarchy

Council welcomes the general support for the preferred option and will further review each settlement against the Settlement Evaluation Framework to determine where best for settlements to be positioned.

5.4 ECONOMY – ISSUES AND OPTIONS

	Option 1	Option 2	Option 3
A - Economic Development Land	Retain existing zonings as currently contained in DAP & SAP	Retain existing zonings along with additional, more sustainably-located, sites that will cater for our assessed future economic needs	Re-evaluate all current economic zonings and rezone / zone new sustainably-located sites catering for our assessed future economic needs

Issues Raised – Economic Development Land

- Support for the re-evaluation of existing economic land and those where there are no extant planning permissions.
- The allocation of economic development lands should be realistic and founded on a robust evidence base.
- Strategic economic development sites close to the new A 5 & A6 or any protected transport corridor should be very carefully considered.
- A need to ensure that economic zonings do not compromise environmental integrity.
- Clarification needed on whether Simplified Planning Zones are to be explored.
- Lack of industrial/employment land take up is due to the zonings being in the wrong location.
- Better policy direction and accompanying guidance needed for new zonings.
- Keen to see re-use of brownfield / derelict sites.
- Fort George should be zoned for regional stadium and associated development.

Consideration and Going Forward - Economic Development Land

There was strong support for Preferred Option 3 to re-evaluate all existing zonings caveated with a desire for additional robust, supporting evidence underpinning any re-evaluation exercise. The sustainable interconnection between lands and residential areas needs was a commonly raised issue. Council will take into account all issues raised before finalising and any site / settlement specific issues that were submitted will be considered at the Local Policies Plan (LPP stage).

	Option 1	Option 2	Option 3
B - City / Town Centres - generally	Strong focus on existing centres whilst constraining District Centres and outer / arterial sites	Balance – focus is on existing centres plus potential limited development in District Centres	Support existing centres but with growth in District Centres and outer / arterial sites

Issues Raised – City and Town Centres

- SPPS para 6.276 is to retain and 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.
- Up to date town centre health checks required. Reliance on summarised third party 10 year old reports (GL Hearn) questioned.
- 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.
- 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;
- City and Town Centre sites need to consider redevelopment opportunity site in response to edge-of-town and out-of-town development;
- Focus needs to be on the City Centre as the Gateway for the North-West; Preferred option would be to focus on existing centres, limited development in District Centres and constraint on outer/arterial sites.
- 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.
- 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 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.
- Need a city centre first approach. There should be a masterplan which needs to identify ‘anchor’ footfall.
- Option 3 is contrary to regional planning policy.
- Key to ensuring town and city centre vitality will be ensuring appropriate balance of uses.

Consideration and Going Forward - City and Town Centres

A significant number of responses to this option were received with a spectrum of opinions put forward. While most were broadly supportive of a 'City / Town Centre' first approach, several others argued that such an approach could hinder future development opportunities. Enhancing the vitality and viability of our centres and becoming multi-use locations was also generally supported. The need for robust evidence and up to date baseline data was perceived as essential prior to finalising next steps in the Plan Strategy. A town centre health check will be carried out as part of the recently commissioned LDP Retailing study.

	Option 1	Option 2	Option 3
C - Retailing Capacity	Existing amount of provision is adequate, generally across Derry and Strabane and retail types	To allow growth of retail supply generally	Monitor retail capacity and plan for sustainable, phased growth

Issues Raised – 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.
- An evidence base would have assisted the generation of Options.
- The issue of qualitative as well as quantitative need is important including competition and choice and flexibility.
- Ensure preferred Option 3 is consistent with the SPPS.
- Impact of future events i.e. Brexit will impact on preferred option for retail.
- Support for Option 3 but needs 'tight control'.
- 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.
- Commitments at Crescent Link and Rosstown Road must be taken into account.
- There is an oversupply of convenience floorspace in the City e.g. Lisnagelvin District Centre has an extant permission for redevelopment and Springtown has an unoccupied extension.
- There needs to be more retailing evidence to consider retailing provision.
- Need to monitor retail capacity.
- Consideration should be given to recognising Drumahoe Village as an existing retailing node serving the local catchment and the wider rural area.

Consideration and Going Forward – Retailing Capacity

While a mixture of opinions have been put forward ranging from adopting a *'laissez-faire'* approach to recognising Drumahoe as a retailing node, there is broad agreement that further evaluation is required to inform the future direction the LDP will take.

	Option 1	Option 2	Option 3
D - Derry City Centre	Evaluate the existing Central Area & Commercial Core within Cityside and Waterside, clarifying / simplifying their definitions / roles and adjusting their boundaries if necessary	Retain the existing Central Area plus a compact Cityside focus for commerce	Expand the overall central areas within Cityside and Waterside

Issues Raised – 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.
- The terminology used in the new LDP should be consistent with the SPPS. It should refer to 'City Centre' and 'Primary Retail Core'. 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.
- Concur 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.
- Clarify definition and role and study appropriateness of these boundaries of the Central Area and City Centre. Rationalise city centre boundary – just one needed.
- Issues about Derry City that were raised that went beyond the stated option included the following: Promote mixed uses in the centre. City/ town centre living needs to be encouraged – especially affordable accommodation suitable for single households. 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. Moving

University into city centre should be considered. 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. The presence of gambling arcades in the area will only act to compound the issues; Issues around safety. The city centre could be made safer by encourage more people to live in the city centre above business premises. 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; 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.

Consideration and Going Forward – Derry City Centre

There was broad support for the Preferred Option 1 with the proposed evaluation of both the Central Area and the Commercial Core of Derry City Centre. The need for clarification around the definitions and whether to amend the boundary were the main responses to this option.

The representation responses regarding Derry City Centre also raised issues which went beyond the stated options and these issues will be taken into account in the relevant part of the LDP going forward. Accommodating new appropriate uses, encouraging city centre living and footfall, and ease of accessibility were just some of the issues raised which will be considered going forward.

There will be a Retail Capacity Study and City Centre Health Check Study carried out and the findings of these will inform and underpin any potential boundaries review.

	Option 1	Option 2	Option 3
E - Strabane Town Centre	Maintain existing Strabane Area Plan Town Centre boundary, subject to detailed re-evaluation of boundaries	Contract the existing Town Centre boundary to a more compact form	Expand Town Centre boundary to beyond the Bypass / Camel's Hump area

Issues Raised – Strabane Town Centre

- Preferred Option is ambiguous and evidence base lacking.
- Consolidate Strabane Town centre retail boundaries.
- Consideration needs to be given to cross-border location.
- Support shown for Preferred Option 3.
- Improve connectivity within the town centre.
- Consolidate Strabane Town centre retail boundaries.
- Potential implications arising from Brexit.

- Support for Option 3 to extend boundary beyond the Camel's Hump and By-pass.
- Implications arising from the A5 road. New road line could see trade being diverted away from the town centre.
- Maintaining the existing town boundary is not going to be fit for commercial purpose.
- Lack of riverside strategy.
- Strabane needs to have ambition to deliver retail, consistent with its status as the second largest town.
- Expand Strabane town centre boundary to beyond the by-pass/Camel's hump area.

Consideration and way forward – Strabane Town Centre

There was support for Option 1 as well as strong support for Option 3. The need for robust evidence and up to date baseline data was perceived as essential prior to finalising next steps in the Plan Strategy. There will be a Retail Capacity Study and Town Centre Health Check Study carried out and the findings of these will inform and underpin any potential boundaries review.

	Option 1	Option 2
F - Local Towns – Castledearg, Newtownstewart, Claudy	Retain the compact Town Centre boundary for Castledearg and define compact Town Centres for N'Stewart (existing designated town) & Claudy (proposed new town)	Do not define Town Centres for Castledearg, Newtownstewart or Claudy

Issues Raised – Local Towns

- Lack of clarity as to selection of Claudy, Newtownstewart and Castledearg as local towns and omission of Eglinton.
- Council needs to ensure that the assessment of Claudy supports its designation as a Local Town.
- Claudy should remain a village leaving Castledearg and Newtownstewart as the only two local towns within the Council area. The suggestion to change the status of Sion Mills could have a negative impact on Strabane which is only a few miles away.
- Do not see the need for town centres for Claudy or Newtownstewart.
- Support for Option 1

- The important role of the 'Local Towns' needs to be recognised. These settlements already have the necessary services, infrastructure and 'critical mass' to enable them to cater for their catchment populations.

Consideration and way forward – Local Towns

While support was shown for Preferred Option 1, the responses were generally limited in relation to the local towns options. That said, the points in relation to Claudy, Castlederg, Eglinton and Newtownstewart will be taken into account as part of the wider review and consideration of issues raised throughout the preparation of the LDP. The Settlement Evaluation Framework will be re-visited and there will also be a Retail Capacity Study and Town Centres Health Check Study carried out and the findings of these will inform any boundaries decisions.

	Option 1	Option 2
G - Transport	Plan to maximise the opportunities for sustainable development arising from the A5 / A6 upgrades and other orbital / cross border links. Also promote Active Travel opportunities and accessibility and connectivity within our main urban settlements	Maintain / accept current transport links and plan for commensurate level of sustainable growth. Also promote Active Travel and accessibility within our main urban settlements

Issues Raised - Transport

- POP should draw out clearly the links between the plan objectives and transport and identify a number of realistic strategic options
- 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.
- DFI reiterates need for LDP & Local Transport Plan processes to be integrated and to influence each other.
- DFI draws Council attention to SSPS para 6.301 which outlines strategic policy to be taken into account in the preparation of the LDPs.
- 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.
- Transport – A2, A5 & A6 vital. A5 & A6 Reminder re SPPS & PPS3 AMP3 affording protection to key transport corridors in terms of creating new accesses onto them
- Comments on potential impacts from unauthorised development on A6 & A5
- The dualling of the N14 (Strabane-Letterkenny) needs to be explicitly referenced
- Comment on 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.
- Park and ride schemes need to be identified.
- Connections Plan, highlighting safe pedestrian access, a car parking strategy and a public transport plan.
- 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).
- POP is light on trains, port and airport.
- Rail improvements across the District would expand peoples transport options and new sustainable housing areas alongside.
- City/Town Centres. To make them vibrant there needs to be accessibility by public transport.
- Any development that is likely to generate ‘significant movement’ in the rural area and cannot be served by public transport should be refused;
- Significant level of comments in relation to cycling, walking and moving away from the car. These are summarised and considered under Section 9H

Consideration and Going Forward - Transport

This topic generated a significant amount of correspondence. There is support in terms of the strategic importance of the A2, A5, A6 and N14. However there is some caution in relation to the option to maximise the opportunities arising from such routes as it was highlighted that such routes have a strict regional protected routes policy applied to them.

The broader theme that comes from the responses is it that the POP does not fully reflect the importance of transport on planning and land use. There is support for exploration of alternative modes of transport and a move away from the car. There is a suggestion that as a minimum that the POP should reflect the regional strategic objectives for Transport as set out in the SPPS.

Noting the level of representation at POP stage on this topic, we will review and consider the views put forward and re-assess how we address this issue at Plan Strategy. We also re-engage with key consultees such as DfI, Sustrans and Translink to order to further consider the comments raised. We will also be commissioning further transport studies and car park studies, which will inform the best way forward for transport in the LDP.

	Option 1	Option 2	Option 3
H Tourism	Identify flagship Tourism sites / areas along with opportunities for dedicated sustainable attractions and associated accommodation. Focus on improved accessibility, place-making and legibility of tourism offer	Plan for further opportunities that emerge, to expand current offer generally	Focus on the protection of our Tourism assets and constrain Tourism development potential

Issues Raised - Tourism

- Need a revised objective to promote tourism development more generally throughout the district, including rural areas. SSPS requires a Tourism Strategy. Policy Option 3 does not take account of regional strategic policy which is to facilitate sustainable tourism development.
- The LDP is critical to the achievement of the Draft Tourism Strategy.
- City/town areas as tourist destinations as whole. Promoting tourism in the heart of the City Centre.
- 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. Need to ensure protection of tourism assets and settings due to degradation from tourism growth.
- All new major visitor attractions need to have a mobility plan developed in tandem with appropriate input from Translink. Linking a city cycle network with tourism – huge opportunities to explore in this area. Pedestrianisation of the walled city should be explored as a transformational tourism/economic initiative for the city and district.
- Plan needs to provide for a sufficient range of hotel and bed space accommodation with future hotel developments being located close to transport hubs.
- Strabane is a tourism gateway. Need to make proper provision for the Sperrins Heritage Sperrin Centre – what should be done with it?
- 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. Growing caravan/motor home and ‘glamping’ sector should be actively encouraged.
- The vision of the LPD should not be limited to flagship sites or tourism zones.
- Promoting high end tourism, making a significant contribution to the visitor economy.

- 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.
- Preferred option needs to clarify that it will protect / safeguard tourism assets.

Consideration and Going Forward - Tourism

There is support for the preferred option. Given the support for Option 2, it is proposed that we review, alongside key consultees how Council’s Tourism Strategy will maximise the tourism potential in our District and how this integrates with the LDP. It is recognised that Derry City, Strabane and the rural areas, including our AONB are important tourism destinations, gateways and facilities. It was noted that tourism accommodation & related facilities (particularly in rural areas) were considered areas of concern. The LDP can seek to shape the physical environment to improve accessibility, such as ensuring key tourism and leisure attractions are accessible by a range of transport options, including walking and cycling. Ongoing liaison with all relevant stakeholders will be undertaken as these issues are considered as part of the Plan Strategy preparation.

	Option 1	Option 2	Option 3
I -Minerals Development	Planning Strategy for Rural NI (PSRNI)	Retain Existing – substantially unchanged	Stronger protection for Minerals Safeguarding areas and also stronger Minerals Constraint areas / policies

Issues Raised – Minerals Development

- 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.
- Opposition to areas of mineral constraint.
- 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.
- Support for mineral policy which will seek to minimise / eliminate potential risk to environmental health.
- Identify 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.

- Inadequate minerals policy has been a major problem for many decades failing to protect designated sites including the River Faughan SAC.
- 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.
- 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.
- Development should be steered away from protected sites and policy wording should provide sufficient protection to the natural environment.
- Carrying forward a failed Minerals Policy into the LDP is a mistake and an inadequate approach if sustainable planning is to be achieved.
- Minerals – no fracking at any time.

Consideration and Going Forward – Mineral Development

There have differing views on best to deliver new minerals policy for the LDP. Some of the views include the concern that carrying forward the existing policy in PSRNI does not take into account the regional strategy in SPPS. Other views include preference for specific aspects of the SPPS, such as opposition to ‘Areas of Mineral Constraint’ as proposed by SPPS.

There is also support for a balanced policy that gives account to environmental issues. Other responses view the current policy approach as not appropriate and believe that it shouldn’t be carried forward. As this is a complex issue, we will continue to engage with key stakeholders in order to formulate a policy approach for minerals.

	Option 1	Option 2	Option 3
J - Rural Economy	To focus rural economic development proposals in the Local Towns and Villages, to drive the rural economy	Balanced, opportunities in the rural settlements for appropriate-scale development / employment plus opportunities for appropriate business starts and small businesses in the countryside, to promote a vibrant rural economy	Rural development / businesses promoted generally across the District, wherever it emerges spatially and with only minimal restrictions

Issues – Rural Economy

- Business ‘Start-Ups’ and ‘Homeworking’ are crucial in contributing to rural economies and polices need to be suitably tailored to support small scale enterprise; Proposed new policies for enhanced opportunities in the countryside welcomed so as to sustain vibrant rural areas and their

communities.

- Some further definition of the kinds of business which would be considered 'appropriate' in the countryside is needed in a controlled manner to help sustain the rural economy.
- Focusing rural economic development in towns and villages is far more sustainable as a whole. Pro sequential test for rural economic development. Development should primarily be located within settlement limits.
- Concern for the possible sustainability implications of the preferred approach – especially new business starts and small businesses in the countryside. RDS SFG11 aims to promote economic development opportunities at the hubs and only in the rural area with exceptions.
- 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.
- Any development that is likely to generate 'significant movement' in the rural area and cannot be served by public transport should be refused.
- 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 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 non-farming rural business opportunities.

Consideration and Going Forward – Rural Economy

The key issue raised in the representations was how the LDP will strike a balance between sustaining rural communities while protecting the environment from inappropriate development. As well as promoting rural business and employment opportunities in the countryside, there is clearly a need, in terms of Independent Examination "Soundness" to apply regional strategic policy at a local level. Council must ensure that there is a robust evidential context to underpin any proposed departure from stated SPPS rural economy policy.

5.5 SOCIAL DEVELOPMENT - OPTIONS

	Option 1	Option 2	Option 3
A Strategic Housing Distribution	Dispersed across the Settlement Hierarchy, including countryside in proportion to settlement tier	Concentrated emphasis on urban, central, sustainably accessible locations	Balanced – moderate focus on Derry city as a Regional City, as well as Strabane town as a Main Hub plus housing opportunities across the settlement tiers at appropriate scale / densities and in the countryside

Issues Raised - 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.
- The preferred option should be amended to state a primary focus on Derry and Strabane but with other opportunities across the settlement tiers.
- LDP should limit growth of dispersed, single dwellings in the countryside.
- As the second largest settlement tier at 14.4%, DCSDC must make proper accommodation in the LDP for countryside development - including non-farming development
- There should be opportunities across the settlement tiers.
- Support for option 3 with a strong emphasis on the Local Towns
- More detail in relation to the options would aid understanding of the implications of each
- 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.

Consideration and Going Forward - Strategic Housing Distribution

There was support shown for all 3 options within the responses received. The views included those advocating a “dispersed” pattern of development, which would allow development at all tiers and locations. There was also support for the “concentrated” approach, as this was seen as the most sustainable. The “balanced” approach was also supported with some wording changed. This would merit further consideration.

Going forward, it is still considered that the “balanced” approach provides the most appropriate solution for our District, possibly with a modified wording, however it is acknowledged that the chosen option must be supported by a robust evidence base.

	Option 1	Option 2	Option 3
B Housing Allocation Quantum	- Current Housing Growth Indicator (HGI) as per RDS 6,500 dwellings	Balanced, Planned Growth of 12,000 dwellings	Previous Housing Growth Indicator (HGI) as per RDS 16,000 dwellings

Issues Raised - Housing Allocation Quantum

- Support for the balanced planned growth as set out in option 2
- 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 needs to clearly identify the appropriate evidence to underpin the growth strategy and 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.

Consideration and Going Forward - Housing Allocation Quantum

Specific preferences for each of the options were not raised in any significant quantity in the POP responses. However there is a clear message in the responses in relation to Housing Quantum in respect of the use of evidence. There are a number of responses that refer to the importance of the use of current data/evidence to underpin the preferred Option 2.

Moving forward on this topic it is clear that Council must ensure that the preferred option is underpinned by verifiable evidence. Given the critical importance of this matter to the overall plan, it is proposed that we undertake a specific study on housing growth as part of our evidence to ensure it supports the preferred option.

	Option 1	Option 2	Option 3
C - Location and allocation of housing land	Rely on existing zonings and settlement development limits	Retain committed and zoned housing land for residential, re-evaluate un-committed sites and allocate any further required land in accordance with sequential test in SPPS, and deliverability	Re-evaluate all existing zoned land on the basis of sustainability. Only carry forward zonings deemed sustainable. Allocate all land based on sequential test in SPPS

Issues Raised

-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.

-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.

-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.

-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.

- Existing zoned land for which planning has not been sought should be re-evaluated on the basis of sustainability.

- 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.

-Committed sites should be retained in addition to new land.

- Location and allocation of housing land - there should be a review of housing zonings and unzone some housing lands.

Consideration and Going Forward

There was significant support for Option 3 and it was presented that this approach was the most desirable in terms of sustainability. However there was also notable recognition that Option 2 took into account the legacy of the previously zoned housing land and in particular the commitment in the form of planning approvals.

Given the support for Option 3, we will further consider the viability and implications of this option before settling on a final option.

	Option 1	Option 2
D – Social / Affordable Housing and Balanced Communities	Incorporate the principle of including social, private and affordable housing & cross community. Consider policy and mechanisms to deliver balanced communities and meet all housing need / demand. More research needed by DfI, DfC, NIHE and Council	More research needed by DfI, DfC, NIHE and Council on this area. The need is not proven for policy response, so do not include in the Plan. Possible future subject plan or supplementary guidance

Issues Raised - Social / Affordable Housing and Balanced Communities

-Noted that preferred option on housing allocation quantum is silent on the proportion of social housing required to meet assessed need.

- 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.

- Like to see an affordable housing policy promote social housing development in mixed tenure developments.

-Agree – identifying mechanism to achieve not easy – developer contribution?

- 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? Option 2 is preferable.

- 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.

-Social housing but protection from speculative developers wanting social housing on unzoned land.

- Consider the provision of rural social housing.

-Should have a minimum requirement for social housing of bungalows and lifetime homes.

Consideration and Going Forward - Social / Affordable Housing and Balanced Communities

We have received comments in relation to the level of Social Housing needed for the plan period. We will continue to work closely with NIHE to ensure that we have the most accurate and up-to-date figures for social housing need. This will take into account the amount and location of housing needed.

Whilst there is a tentative welcome from some quarters for the preferred Option, there have been queries on how this would be best delivered. Deliverability will be one of the aspects that will be researched with the named partners. Some responses from the housing industry have added a note of caution in relation to the preferred Option and are worried that a policy that it is too rigid may impede development. Again, the wording and the application of any policy will form part of the research as suggested in Option 1.

	Option 1	Option 2	Option 3
E - Open Space / Recreation (OSR)	Protect the existing and zoned OSR provision as set out in DAP and SAP	Re-evaluate our current OSR provision in terms of role and function and identify and protect any existing land and additional land required for open space, sport and recreation	

Issues Raised - Open Space / Recreation (OSR)

-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.

- Housing Executive strongly supports Option 2 to identify and protect Open Space and the selective redevelopment of portions of open space

-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 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

-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.

-RSPB do not accept DCSDCs proposal to only protect suitable and necessary OSR land –this is a significant departure from PPS8 and SPPS;

-Note re-evaluation and concerned at term “underutilised” – infers all open space must be used by people.

-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

-Create parks shared by surrounding neighbourhoods

-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

-Need to re-evaluate the current Open Space Requirement position in terms of role and function and identify and protect an existing land. The example of formal sporting activities such as the provision for GAA was noted on a number of responses.

-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.

Consideration and Going Forward - Open Space / Recreation (OSR)

Two divergent views are represented in the comments received on this topic. On the one hand there is a view that the current approach should be taken, which affords protection to all open space regardless of role and function. On the other hand there is an acknowledgement that there are certain open spaces, which create anti-social issues and hold no real value in terms of ecology and visual amenity, which may be best used for other uses.

Planning, and other officials within Council, will undertake a re-evaluation of both our formal and informal open space. This will inform the amount of OSR land required for the plan period and will also inform the protection afforded to OSR land in the LDP policy.

	Option 1	Option 2	Option 3
F - Community Infrastructure	Identify/Zone/Protect Committed sites	Existing provision of Health, Education, etc is considered adequate	Identify/Zone/Protect a long-term reserve of potential sites

Issues Raised - Community Infrastructure

- 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.
- 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.
- Required for the entire plan period should be identified in the plan and considered as part of furthering sustainable development alongside housing and jobs.
- 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 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.
- Community Infrastructure. Do not favour any of the three options. Instead integrate community infrastructure into existing neighbourhoods within high street typology.

Consideration and Going Forward - Community Infrastructure

There is broad support for the proposed Option 1, however it has been highlighted that we need sound baseline evidence on the intentions of the various statutory consultees in relation to their estates. We will continue to engage with our key consultees to ensure that their interests are considered in the LDP.

	Option 1	Option 2	Option 3
G - Waste	Existing Infrastructure & committed Capital Proposals identified & protected	Identify/Protect a long-term reserve of potential projects / sites	

Issues Raised - 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.

-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.

-could/should these two options not be incorporated into a single option?

- need to invest to grow the circular economy in line with the proposed move towards zero waste for the city and region.

- Known illegal landfill site within District-how should be dealt with and what future use should land be put to?

- The North West region has a recognised shortfall in provision for landfill, especially for inert waste.

-Housing Executive supports waste policy approach.

-A number of private operators have proposed their land for waste disposal

Consideration and Going Forward - Waste

The LDP will take on board the comments made in relation to waste. The way forward for the LDP will involve further consideration of the key issues raised such as zero waste, circular economy and illegal dumping. This will involve further working with other Council officials and engaging with key stakeholders in this area and there will be further consultation with statutory bodies where necessary.

5.6 ENVIRONMENT - OPTIONS

	Option 1	Option 2	Option 3
A - Natural Environmental	Existing designated sites / protected species are identified / protected, with Policies as per SPPS. Other habitats, species or features of natural heritage importance will also be protected in line with the SPPS	In addition to Option 1, designate additional local designations and preclude inappropriate development likely to have significant adverse impacts on such sites	Protect only those currently designated sites / protected species and accommodate development in all other locations

Issues Raised – Natural Environment

- DFI request justification for selection of Option 1 over Option 2
- Recommends that richness and diversity of the heritage (natural, historic & built) should be fully acknowledged across POP e.g. River Foyle, valley & catchment.
- Recommend an integrated management approach to heritage assets – natural & cultural heritage as intertwined
- Disagree with chosen preferred option for Nat Environment & Built environment / Heritage
- Welcome protection of sensitive locations within AONB's from renewables.
- 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.
- Environment Objectives C (i) welcomes promotion of health and well-being and enhancement of natural environment to achieve biodiversity.
- DCSDC must take a more explicit stance in terms of its responsibilities towards the Sperrins Area of Outstanding Natural Beauty.
- Existing policies have failed/failing designated sites.
- Option 2 would be more desirable but understandably would need extra resources.

-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.

- 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

- 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.

-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.

Consideration and Going Forward - Natural Environment

Recognition that SPPS approach as per Option 1 takes account of international, national, protected species and local designations. However there is a feeling that that such designations are not enough on their own and that they should be supported through appropriate policy and policy application.

There is also notable support for Option 2, in terms of identifying additional local designations. This option will be explored in conjunction with the Council’s wider Biodiversity Action Plan and we will also take into account the suggested areas raised through this consultation exercise.

	Option 1	Option 2	Option 3
B Landscape Character	Informed by the existing NI / Regional Landscape Character Area Assessments and their associated Sensitivity considerations, permit further sustainable development accordingly on a case by case basis	Informed by LDP Development Pressure Analysis and relevant Landscape Character Assessments, identify those areas of our landscape with higher sensitivity or ‘at capacity’ and identify development that may be inappropriate in these areas	Accommodate growth / development wherever possible, utilising the minimal number of protected landscape designations in the LDP

Issues Raised – Landscape Character

- Landscape Character - expand Option 2 and undertake up to date LCA for the plan area. List all plan area landscape designations.
- 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
- 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
- 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 that they do not do harm.
- Work together on minerals / renewable energy on AONB and other sensitive landscapes;
- Particularly supportive of sensitive Landscape Zones being protected from Renewables projects;
- Do not want area-defined prohibitions or restrictions on high structures within AONBs or other landscape designations.
- 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.
- 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.
- 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).
- 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
- Mineral and aggregates extraction has the potential to negatively impact on landscapes but with modern standards possible impacts can be significantly mitigated.

-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.

- 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

-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.

Consideration and Going Forward – Landscape Character

The responses have highlighted that the existing Landscape Character Areas for the District are dated and need reviewed. The Sperrins AONB has been identified as a key landscape and there were comments supporting the protection of this landscape from high structures such as wind farms. However the renewable industry have a different view and believe that a blanket designation could be counterproductive to the wider renewable strategy.

Going forward, there will be a requirement to have to up-to-date Landscape Character Area assessments and a review of the Landscape Pressure Analysis. We will also have to consider in more detail the comments from the renewable energy industry to understand the implications for the wider renewables strategy.

	Option 1	Option 2	Option 3
C - Coastal Development	Accommodate appropriate coastal development as per current UK Marine Policy and forthcoming Marine Plan for NI		

Issues Raised

-Suggest Council consider SSPS policy is relevant and appropriate to local circumstances for Coastal development, economic development, natural environment etc

- Given our maritime location, it is important that DCSDC also reference Irish Maritime Policy.

- 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.

-Coastal development – ensure highest design and sustainability standards are achieved.

Consideration and Going Forward

The above comments have been noted and will be considered in the accommodation of current Marine Policy into the LDP.

	Option 1	Option 2	Option 3
D - Built Environment / Heritage	Existing designated areas / buildings of historic environment importance will continue to be protected and development facilitated with policies in line with the SPPS	In addition to Option 1, designate new areas / buildings of historic environment importance as part of LDP preparation and preclude all development likely to adversely impact on such sites / buildings or their setting	Protect only those designated areas / buildings and accommodate appropriate development where possible

Issues Raised - Built Environment / Heritage

-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, at odds with other proactive approach for preferred options.

-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.

-Preferred option should not preclude the protection of additional built heritage assets through the LDP process.

-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.

-Option 2 would be more desirable but understandably would need extra resources. Emphasis on Place-making and design will result in a quality built environment;

-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.

-Boomhall should be given a degree of recognition and protection in the new LDP

Consideration and Going Forward - Built Environment / Heritage

The main issue here is whether the LDP should identify locally significant buildings/areas above and beyond those afforded protection as Listed Buildings and/or Conservation Areas. Any requests for additional heritage protection will be fully considered.

	Option 1	Option 2	Option 3
E - Urban Design / Places	Existing design standards are accepted – reasonable design sought on a site-by-site basis	A comprehensive drive for Place-Shaping, including high quality design of both buildings and key focal areas, in both urban and rural areas	Minimal design standards accepted with focus on development and investment paramount

Issues Raised

-LDP should designate specific Design Areas. This would meet the policy requirements of good design within the SPSS.

-Welcome option 2 and recommend high quality design includes green infrastructure (GI). Prefer high design levels across all development rather than restricted to designated design areas. Such design could include ecological networks.

-DfI happy with this approach. Support for 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.

Urban Design/Places. Prefer preferred option. Include high quality design of spaces: street, squares, parks, riverside walkways and their enclosing buildings.

-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.

-Strongly supportive of a place making approach. Relevant urban guidance / supplementary planning policies / DCANS to be included and promotion of Lifetime Neighbourhoods principles.

-RSPB does not agree with preferred option-Urban biodiversity is declining; POP fails to recognise that good design can promote biodiversity and encourage wildlife

-No regard given to the importance of quality design in delivering and furthering sustainable development, including biodiversity;

-Little evidence on how LDP purposes 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;

Consideration and Going Forward

Broad support for the preferred Option and most of the responses have been positive. Recognition that urban design goes beyond designing buildings and architecture and that it involves how our city, town and countryside works. There were some contributions that highlighted that urban design/places should take into account climate change and impacts on biodiversity. This will be taken into account.

	Option 1	Option 2	Option 3
F - Renewables – Wind & Solar	Maximise the wind and solar resource of the District	Identify the most sensitive Landscape Zones remaining, for protection, permitting appropriate wind & solar development elsewhere in line with SPPS	

Issues Raised

-Reminded Options should be set within regional policy. Clarity required why policy options only refer to wind and solar energy

- Encouragement for Council to reflect the wider climate agenda and drive decarbonisation in its LDP and be proactive in reducing reliance on non-renewable energy. 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.
- Council should focus on economic benefits – investment, generating jobs, strengthening grid and reducing harmful emissions and over-reliance on imported fossil fuels.
- 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.
- 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.
- 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.
- Support for sensitive Landscape Zones being protected from Renewables projects-AONBs and SPAs mentioned.
- Strategic spatial approach to renewable energy development bring proposed by Mid Ulster 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
- Cumulative impact of single turbines will require further attention
- References dated studies and seeks clarification on whether Council has carried out its own assessment
- That important contribution of a renewable energy supply is absent from POP baseline consideration of energy infrastructure.
- Onshore wind energy is acknowledged by UK Government as offering the cheapest form of energy.
- LDP should make provision to ensure adequate power supply is accessible across NI.
- Council needs to develop an ambitious plan for low carbon urban areas which will deliver economic, environmental and health benefits.
- Housing Executive 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.

-Consider impacts of turbines on CODA radar.

-Passive homes should be encouraged

Consideration and Going Forward

This section attracted a considerable amount of comments. In particular the issue of protecting sensitive landscape zones raised differing views. On the one hand there was support for the protection of areas such as the Sperrins AONB, however there was also those who advocated the view that such a spatial policy/strategy would be unduly restrictive and detrimental in term of meeting the overall renewable objectives. It is important that we take into consideration all material considerations and make a balanced decision on this matter.

A further theme coming through in the responses is that the POP does not adequately reflect the wider “Climate Change” agenda and how all types of renewables/strategies can contribute to that. This is an area that will require further consideration to ensure that the LDP properly reflects our approach to climate change.

Some of the submissions have raised comments about a lack of evidence, out dated evidence or the need for further study. This will be taken on board.

	Option 1	Option 2	Option 3
G Flooding	Avoid all further development in flood prone areas, or those forms of development which exacerbate flooding elsewhere	Precautionary approach – only allow suitable types of development in flood prone areas in line with SPPS / PPS and with appropriate mitigation	

Issues Raised

-A number of representations supported Option 1, which would be to avoid all further development in flood prone areas, or those forms of development which exacerbate flooding elsewhere. This is seen as the “true” precautionary approach.

-DFI prefer no tweaking to technically complex flooding policies, which are broadly aligned to Option 2 above. DFI stresses SPPS para 6.129 “no sites or zone lands that may be susceptible to flooding now or in the future.”

- Housing Executive keen to see comprehensive policy in PS to deal with all aspects of flooding - prevention and mitigation. Promote SuDs.

-Flooding policy should be aware that woodland has the ability to “slow the flow” and alleviate downstream impacts. Research indicates 47, 915ha of potentially high priority land for the creation of woodland to assist in flood risk mitigation.

-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.

Consideration and Going Forward

There is support for each of the 2 options. Option 2 is in line with current planning policy, whilst Option 1 would remove the ability to identify exceptional circumstances as set out in current policy. Given the support for Option 1, it is proposed that we review, alongside key consultees, what scope there is to remove the exceptions that are set out in current policy.

We have also received suggestions for flood alleviation such as forestation, open space and SUDs. These will all be considered further in conjunction with key consultees. Since the flooding event of 22 August 2017, there is certainly now a greater awareness and sensitivity about flooding, and its direct link to land-use Planning.

	Option 1	Option 2	Option 3
H - Transport – Environmentally and people-friendly	Identify / encourage / require pedestrian accesses / footways, cyclepaths / bridlepaths and other green / blue proposals		

Issues Raised

-POP should draw out clearly the links between the plan objectives and transport and identify a number of realistic strategic options

-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.

-DFI reiterates need for LDP & Local Transport Plan processes to be integrated and to influence each other.

-DFI draws Council attention to SSPS para 6.301 which outlines strategic policy to be taken into account in the preparation of the LDPs.

- 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. Feels that POP does not seek to make cycling a genuine transport option through safe and segregated infrastructure.
- Council should introduce a Sustainable Transport score for areas across the District according to their current provision of public transport and active travel infrastructure
- Supportive of active travel & improving connectivity between settlements.
- Developers should contribute more in terms of cycle paths / walkways.
- 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).
- 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.
- 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.
- Walking and cycling accessibility should be a key and early consideration in site selection.
- It is unclear from the wording whether the commitment to Active Travel is solely for main urban settlements or across the District.
- 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.
- 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'.
- 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.
- A strategic approach to developing sustainable transport networks is required as opposed to a piecemeal approach through developers and individual applications.

-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.

-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.

-Linking a city cycle network with tourism

-A Connections Plan, highlighting safe pedestrian access, a car parking strategy and a public transport plan

Consideration and Going Forward

This topic, along with the “Transport” option contained within Section 4, generated a significant amount of correspondence. The broad theme that comes through, from both statutory bodies and the public, is that whilst the POP acknowledges transport and active travel, it does not set them at the heart of the LDP. There is strong support for using the LDP as a catalyst for a modal shift which would reduce the need for the car. It is highlighted that this is line with the wider regional policies as set out in the SPPS and it also meets broader plan objectives in relation to the environment and health and well-being.

Given the level of representation at POP stage on this topic we will review and consider the views put forward and re-assess how we address this issue at plan str

5.7 REVIEW OF PLANNING POLICIES - LPD APPROACH AND OPTIONS

General Development Principles	Formerly in PPS 1, see SPPS	Retain Existing – substantially unchanged	Include Principles of Place-making and good development – on noise, odour, dust, neighbourliness, good design, landscaping, energy efficiency, etc
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Issues Raised

-Clarification sought on whether the LDP would set out the Council’s view on public vs private interests in planning

-A number of comments indicating that options within POP don’t marry up with the SPPS definition of “furthering sustainable development”

- A number of comments indicating that options within POP don’t marry up with the SPPS definition of “mitigating and adapting to Climate Change”

- A number of comments indicating that options within POP don’t marry up with the SPPS definition of “improving health and well-being” i.e. promotion of car over other modes of transport

Consideration and Going Forward

The principles of planning as set out in the SPPS set the tone for the preferred regional policy direction. This approach to planning intends to extend beyond land use to integrate policies for the development and use of land with other key policies and programmes which influence the nature of places and how they function. We have noted that some of the comments above indicate that we need to be more mindful of this approach to planning and going forward we need to be mindful of other key policies and programmes in order to get the most out of the LDP.

Natural Environment	PPS 2	Retain Existing – substantially unchanged	Retain Existing – substantially unchanged, with stronger policy on high structures / cumulative impact in AONB
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Issues Raised

Neighbouring Councils should cooperate on Sperrin AONB policy development.

-Clarification on various relevant points of policy and guidance i.e.

Paragraph 10.3 states that existing policy will be retained, substantially unchanged. This differs from paragraph 10.6 which states that policies in SPPS replicated in PP2 could be dropped, the remaining ones carried forward and policy NH6 (AONB) replaced. Clarification needed if LDP is to be quiet on nature conservation policy.

-As per PPS2 NH5 Council through policy / guidelines should not permit development on ancient or long established woodland sites.

-Prefer current planning policy SPPS / PPS18 / PPS2 rather than LDP imposing area wide prohibitions.

-Policy on natural heritage should include restoration and enhancement

-Designations – Buffer zones around designated sites should be considered for inclusion and the current provisions of PPS 2 carried across in full into the LDP;

-The LDP must afford protection to local designations such as SLNCIs and the current provisions of PPS 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’.

-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.

-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.

Consideration and going forward

Responses on PPS 2 highlighted the differing views on having a specific spatial policy/high structures policy for the AONB. This is an issue that has been raised across several areas such as Natural Environment, Landscape Character and Renewables and therefore will need further consideration.

The remainder of the responses are advocating that elements of the existing policy should be brought forward, this would be largely in line with the preferred approach.

Roads	PPS 3	Retain Existing – substantially unchanged	Clarify on Protected Routes Policy, esp. in regard to new A5 and A6
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Issues Raised

- Reminder re SPPS & PPS3 AMP3 affording protection to key transport corridors.
- DFI draws Council attention to SSPS para 6.301 which outlines strategic policy to be taken into account in the preparation of the LDPs
- It is not clear what clarification is required in relation to Protected Routes Policy-The proposal to carry forward policies of PPS 3 is welcomed subject to clarification from the Council on what ‘minor changes’ are proposed.
- 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;
- Section 1 PPS 3 to favour the creation of street typology routes as opposed to roads

Consideration and going forward

Responses did not raise objections to the proposed approach. Responses generally emphasise existing policies and have reserved judgement on any “minor changes” that we propose.

Economic Development	PPS 4	Retain Existing – substantially unchanged	Retain Existing – substantially unchanged but slight relaxation for rural and urban small businesses / start-ups. Also review the criteria for protection / release of existing ED land (PED 7)
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Issues Raised

- 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. Concern at the possible sustainability implications of the preferred approach – especially new business starts and small businesses in the countryside.
- 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.

-Support 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.

-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.

-Accommodation must be made for non-farming rural business opportunities.

-Some further definition of the kinds of business which would be considered 'appropriate' in the countryside is needed.

- Policy PPS4 should be reviewed and look at the develop agreement which may assist in the delivery of an economic development site.

-While PPS4 is unduly restrictive to rural enterprise, it would be useful to review evidence which supports this concern

-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.

-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

Consideration and going forward

There is support in the responses for a review of elements of PPS 4 and in particular economic development in the countryside. However there is also concern that such an approach is not sustainable and there does not appear to be any evidence presented to support a move away from regional policy. This is an issue that requires further research and consideration.

We have also noted comments in relation to the compatibility of economic uses and lack of policy direction on zonings. Further consideration will be given to these in the preparation of the plan strategy.

Retailing	Formerly in PPS 5, see SPPS	Rely on Existing principles in SPPS – substantially unchanged
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Issues Raised

- Retail Hierarchy needs re-assessed
- There should be less focus on out-of-town developments
- Comparison goods and retail warehousing has been detrimental to the vitality of the city.
- Retail capacity study is important in forming an opinion on retail policy
- Retail hierarchy and retail capacity are matters that are of a strategic nature that should be considered at this point in the process
- 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 core principles of the SPPS.
- There would be 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;
- 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;
- SPPS is silent on petrol filling stations;
- Is there a fundamental need for Council to review the policies or formulate its own policies in the same way Mid-Ulster has done in their POP?
- City and Town Centre sites need to consider redevelopment opportunity site in response to edge-of-town and out-of-town development;
- 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.
- The LDP needs a planning framework which is supportive of modern, Local Convenience, locally accessible shopping and should be encouraged in the LDP.
- 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.

Consideration and going forward

There are some comments in relation to town centre vs. out of town retailing. There have also been suggestions on what the retail hierarchy should look like and where centres should be placed on that hierarchy. Given that Council will be carrying out a retail capacity assessment in advance of the next stage of the LDP, it is view that our approach will remain as set in the POP subject to further consideration of the study.

We will consider the need for other policies such as retail frontages, petrol stations etc and in doing so will take into consideration the comments received.

Built Heritage	PPS 6 plus Addendum	Retain Existing – substantially unchanged.
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Issues Raised

-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

- 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.

-Retain policy BH5 in light of current state of discussion about possibility of seeking World Heritage status for Derry-Londonderry

-Para 10.3 & 10.12 conflict. Clarity required.

-LLPA’s policy required consistent with SPPS para 6.29/30

-Application of existing policy too strict. Protection of built heritage is important but it should not be a barrier to sensible and sensitive proposals to support economic development.

-Planning Policies are adequate – need stricter enforcement of conditions

-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.

Consideration and going forward

More clarity is required in relation to the wording of this policy and we will engage with NIEA on this matter. No major objection to the policy approach in the responses received, however there was some comment on it should be applied in practice. There was also a request to retain BH5. As this would be a departure from our preferred approach, it will require further consideration and consultation with key stakeholde

<p>Quality Housing</p>	<p>PPS 7 plus Addendums on residential character and extensions</p>	<p>Retain Existing – substantially unchanged</p>	<p>Retain Existing – substantially unchanged, but greater emphasis on density standards – appropriate to the type of settlement and location in the settlement. Amalgamate the Addendums with the policy</p>
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Issues Raised

-Strongly supportive of a place making approach. Relevant urban guidance / supplementary planning policies / DCANS to be included and promotion of Lifetime Neighbourhoods principles

-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.

-LDP policy as a minimum needs to replicate the wording of SPPS, PPS21 and addendum to PPS7;

- Like to see a policy in the PS which caters for all those with specialist needs – supporting evidence included

- Like to see a policy in the PS ensuring an appropriate mix of 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

-Should have a minimum requirement for social housing of bungalows and lifetime homes.

Include high quality design of spaces: street, squares, parks, riverside walkways and their enclosing buildings

Consideration and going forward

Responses received have been broadly in support of the preferred approach to this policy. Some additional issues have been raised that will require further consideration and these will be taken into account when finalising this policy.

Recreation Open Space	PPS 8	Retain Existing – substantially unchanged	
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Issues Raised

-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.

-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.

-Housing Executive 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’ Affordable Housing (social and intermediate housing) to be defined within policy as a “substantial community benefit”

-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.

-Indoor and intensive outdoor sports facilities should following the existing policy approach of SPPS and PPS8;

-Do not accept DCSDCs proposal to only protect suitable and necessary OSR land – this is a significant departure from PPS8 and SPPS;

-Note re-evaluation and concerned at term “underutilised” – infers all open space must be used by people.

Consideration and going forward

Some concern expressed in relation to the preferred option of re-evaluating open space and the implications this would have for the OSR policy. As such we will give this option more consideration, engage with consultees and provide clarity where necessary. We also received suggested amendments that would vary from PPS 8, these will also require further deliberation.

Some responses have raised that we have not carried out a re-evaluation of open space and this is exercise that needs completed. This is noted and we will carry this out in advance of the plan strategy stage.

Enforcement	PPS 9 (cancelled by SPPS)	Retain Existing – substantially unchanged
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Issues Raised

- Planning Policies are adequate – need stricter enforcement of conditions.
- The LDP must be enforced if it is to have relevance.

Consideration and going forward

Whilst we received no comments in relation to enforcement policy we note the above comments which highlight the importance of enforcement as a tool for implementing the LDP.

Waste	PPS 11	Retain Existing – substantially unchanged
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Issues Raised

- Support for waste policy approach.
- Should look at infrastructure within new developments to include communal recycling facilities and promote circular economy and move towards zero-waste.
- Need to invest to grow the circular economy in line with the proposed move towards zero waste for the city and region.
- 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;
- Council should apply a precautionary approach to all waste management proposals
- Disposal of inert waste should be steered clear of sensitive site;

-DCSDC need to make allowances for those identified new sites within the LDP which were not identified as part of the previous two LDPs.

-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.

Consideration and going forward

Whilst there is some support for the waste policy approach, there is also a view that the policy approach does not give enough emphasis on a desired move towards to circular economy and zero waste. There comments will be taken into account and any formulation of policy for waste will also consider wider regional policies and strategies as well as any local waste management plan.

<p>Housing in Settlements</p>	<p>PPS 12</p>	<p>Retain Existing – substantially unchanged</p>	<p>Retain Existing – substantially unchanged, but emphasise the need for Balanced Communities / mix of housing tenures and types, plus mixed communities</p>
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Issues Raised

-Travellers needs to be adequately catered for – retain HS3 / PPS12 or SPPS policy.

-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

-Welcome for the commitment in Section 7.12 of the POP to place an emphasis on sustainability and the exploration of brownfield sites

-There should be an emphasis on brownfield land as per 60% set down in RDS. POP lacks ambition in this regard

-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. 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;

-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.

-Definition of 'Sustainable Development' should be included in LDP

-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 need for affordable and social housing is recognised and the tension between delivering housing and safeguarding the environment

-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;

-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;

- New homes – mixed tenure, distinctive, connected communities. Housing – repair, remake, create terraced residential street. Community facilities in high streets including living over shops.

-Clarification is sought by POP text on 'more research is required by DFI, DFC, NIHE & Council' in relation Social and Affordable Housing and balanced communities.

-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.

-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.

-Like to see an affordable housing policy promote social housing development in mixed tenure developments – reasoning included.

-Affordable housing definition (social rented housing & intermediate housing) needs to be set out as per SPSS.

-Like to see an affordable housing policy promote social housing development in mixed tenure developments – reasoning included.

Consideration and going forward

Responses support the main principles and policies of PPS 12 such as increasing housing density without town cramming, promoting sustainable forms of development and examining the possibility of balanced communities.

There is some concern in relation to a view that the POP is indicating that the overprovision of zoned land could be a driver for reductions in site densities and that this approach would be contrary to regional sustainability policies. This is an area needs to be reviewed.

Clarification is sought on the proposed research on social and affordable housing. We are seeking to advance this research with the key partners as outlined in our option. We will also take into account comments received as part of the research process.

Transportation & Land Use	PPS 13	Retain Existing – substantially unchanged. General principle of integrating with land uses and accessibility	
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Issues Raised

- Support shown for the principles of PPS 13
- Multiple comments received indicating that a preference for more emphasis on the following issues; reliance on private car, cycling, walking, public transport, review of car parking, rural connectivity, climate change agenda, making the city more sustainable and park and rides.
- Options do not fully represent an integrated approach to land-use and transport
- Need for LDP & Local Transport Plan processes to be integrated and to influence each other.
- Attention is drawn to SSPS para 6.301, which outlines strategic policy for Transport to be taken into account in the preparation of the LDPs.

Consideration and going forward

Transportation and land use is an area that attracted a lot of comments. Overall there is a view that these issues need to take a more prominent role in the LDP. Our preferred approach is to take forward the principles as set out in PPS 13 and we also need to consider these alongside the Transport objectives as set out in the SPPS. In doing so we will also need to consider what prominence we give to our overall transport strategy in the LDP.

Flooding	PPS 15	Retain Existing – substantially unchanged	Retain Existing, but clarify Flooding - emerging Reservoir policy -
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Issues Raised

- LDP should address flood risk from all sources.
- DFI prefer no tweaking to technically complex PPS15 policies
- More clarification required on reservoirs
- Some preference for stricter flooding policy which would not allow any exceptions within flood plain.
- PPS 15 – extra clarification needed reservoirs FLD 5
SUDS - SUDS should be promoted within new developments along with retrofits. Revised Draft Consultation on PPS15 attached for information.
- Woodland has the ability to “slow the flow” and alleviate downstream impacts. Research indicates 47, 915ha of potentially high priority land for the creation of woodland to assist in flood risk mitigation.
- Policy should include the promotion of SUDs

Consideration and going forward

Given the technical aspect of flooding, we will review, alongside key consultees, what scope there is changes in current policy.

We have also received suggestions for flood alleviation such as forestation, open space, SUDs. These will all be considered further in conjunction with key consultees.

Tourism	PPS 16	Retain Existing – substantially unchanged	Retain Existing – substantially unchanged but some more scope for rural tourism attractions and accommodation
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Issues Raised

- Exploit flexibilities afforded within PPS16.
- 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.
- 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.
- Ensure protection of tourism assets and settings due to degradation from tourism growth.
- Considers revised objective to promote tourism development more generally throughout the district, including rural areas.
- SSPS requires a Tourism Strategy
- Development should be steered clear from sensitive areas;

Consideration and going forward

Comments have been broadly supportive of the preferred approach. A reminder that policy will need to reflect the agreed local tourism strategy, this is noted.

Advertisements	PPS 17	Retain Existing – substantially unchanged. Stronger on design and materials generally
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Issues Raised

PPS17 – should demonstrate awareness of and make provision for new technology – LED signage

Consideration and going forward

Comments on PPS 17 noted and will be taken into account.

Renewable Energy	PPS 18	Retain Existing – substantially unchanged	Policy for Wind Sensitivity Zones, Solar Zones, others Renewables - need to be flexible for the 'next technology'?
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Issues Raised

-PPS 18 review is ongoing and it is to be completed, including any necessary amendments to the SPPS by the end of 2018.

-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

-Prefer current planning policy SPPS / PPS18 / PPS2 rather than LDP imposing area wide prohibitions.

- Urge Council to have regard to all relevant material considerations supplied before finalising LDP renewable energy policies.

- 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.

- Policy on renewable energy should address the issue of hydroelectric proposals in greater detail.

Consideration and going forward

The outcome of the review of PPS 18 is critical in terms of formulating our renewable policy for the LDP. On a local level there have arguments for and against the imposition of area wide prohibition of wind farms. It is important that we take into consideration all material considerations and make a balanced decision on this matter.

<p>Rural Development</p>	<p>PPS 21</p>	<p>Retain Existing – substantially unchanged</p>	<p>Based upon the SPPS criteria but some clarification and additional opportunities for rural houses – re CTY2a clustering, ribbon-infill, farm clustering, 6-year & 10 year criteria and conversions – all within the parameters of SA, SPPS and our HGI Housing Allocation strategy</p>
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Issues Raised

- PPS 21 review is ongoing and it is to be completed, including any necessary amendments to the SPPS
- 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
- Concern 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.
- LDP should limit growth of dispersed, single dwellings in the countryside.
- 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.

-Preferred Option 2 does not articulate the need for further opportunities in the Countryside or the proposed departure from the SPPS policy approach.

-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

-LDP policy as a minimum needs to replicate the wording of SPPS, PPS21 & addendum to PPS7

-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.

-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.

-Concerns over potential for enhanced opportunities in relation to new dwellings in countryside.

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%.

-As the second largest settlement tier at 14.4%, DCSDC must make proper accommodation in the LDP for countryside development - including non-farming development.

-PPS 21 precludes any rural development beyond farming and farm diversification. This needs substantive amendment in the new LDP.

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

-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)

-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.

-Rural Economy – some further definition of the kinds of business which would be considered 'appropriate' in the countryside is needed.

-Balance needs to be struck between providing appropriate development and protecting the countryside with reuse of buildings promoted;

- Would not be prudent to focus zoned land in Derry and Strabane – would go against economic development and entrepreneurial opportunities for the countryside.
- Support the preferred option to encourage appropriate rural businesses to develop in a controlled manner to help sustain the rural economy.
- Development in countryside needs tightly controlled.

Consideration and going forward

As expected, this policy attracted a substantial number of comments. In the main, there are three views; those in favour of relaxing PPS 21, those in favour of retaining PPS 21 as it is and those in favour of stricter rural policy. Like PPS 18, regional rural planning policy is subject to a current review and it is critical that we await the outcome of that before deciding a local policy direction. Whilst it is likely that many of the comments received will be same or similar to those under consideration under the PPS 21/SPPS review, we must ensure that we carefully consider all the issues received, as well as taking into account any changes to regional policy.

<p>Affordable Housing</p>	<p>PPS 22 (Draft, 2014)</p>	<p>Incorporate the principle of affordable housing. Consider a policy and mechanisms to deliver affordable housing. More research needed by DfI, DfC, NIHE and Council on this area.</p>	<p>More research needed by DfI, DfC, NIHE and Council on this area. The need is not proven for a policy response, so do not include in the Plan. Possible future subject plan or Supplementary Planning Guidance</p>
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Issues Raised

- Social / Affordable Housing & Balanced Communities: Clarification is sought by POP text on ‘more research is required by DFI, DFC, NIHE & Council’.
- City/ town centre living needs to be encouraged – especially affordable accommodation suitable for single households
- 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.
- Development management approach to the provision of affordable housing in the plan strategy.

-Support for a 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)

-Social and Affordable Housing and balanced communities. Agree – identifying mechanism to achieve not easy – developer contribution?

-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 make provision for it as an option outside of a settlement.

-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

-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.

-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.

-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.

-The need for demographic projections of need include demographic projections of need, supporting a growing economy, meeting the need for affordable Affordable housing needs to be considered in the context of the objectives for economic growth

Consideration and going forward

There is broad welcome for a policy for affordable housing, however there is no consensus on a mechanism to deliver this. Therefore we will continue our engagement with DfI, DfC, NIHE and Council on this area.

Enabling Development	PPS 23	Retain Existing – substantially unchanged
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Issues Raised

No issues raised

Consideration and going forward

Continue with our preferred approach

Minerals Development	Planning Strategy for Rural NI (PSRNI)	Retain Existing – substantially unchanged	Stronger protection for Minerals Safeguarding areas and also stronger Minerals Constraint areas / policies
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Issues Raised

-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.

-Opposition to areas of mineral constraint

- 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.

- Support for mineral policy which will seek to minimise / eliminate potential risk to environmental health;

-Identify 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

-Inadequate minerals policy has been a major problem for many decades failing to protect designated sites including the River Faughan SAC

-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

- 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 ecosystems

-Development should be steered away from protected sites and policy wording should provide sufficient protection to the natural environment

-Carrying forward a failed Minerals Policy into the LDP is a mistake and an inadequate approach if sustainable planning is to be achieved.

-Minerals – no fracking at any time.

Consideration and going forward

There have been differing views on how to best deliver new minerals policy for the LDP. Some of the views include the concern that carrying forward the existing policy in PSRNI does not take into account the regional strategy in SPPS. There is some opposition to 'Areas of Mineral Constraint' as proposed by SPPS.

There is also support for a balanced policy that gives account to environmental issues. Other responses view the current policy approach as not appropriate and believe that it shouldn't be carried forward. As this is a complex issue, we will continue to engage with key stakeholders in order to formulate a policy approach for minerals.

<p>Planning Agreements and Community Benefits</p>	<p>The Council intends to further research requirements / mechanisms and to utilise both tools to positively and pro-actively secure legitimate development contributions, for the benefit and proper planning of this District, via the LDP</p>
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Issues Raised

-Planning Agreements – caution against developer contributions for public sector developments where wider societal benefits are the driving force rather than profit.

-Agree with economic growth and seek social clause in planning agreements.

-Useful tools in other areas. Benefits should be significant and sustainable. Look at community benefits derived from Wind Energy applications in Scotland.

-LDP needs to recognise that onshore wind can support social objectives of the POP through community benefit funds

Consideration and going forward

Some constructive comments were received in relation to how to best utilise planning agreements and community benefits. These will be taken into account when formulating our approach to this matter.

<p>Hazardous Substances</p>	<p>The LDP will include appropriate measures so as to meet best-practice in relation to preventing major accidents and dangerous substances.</p>
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Issues Raised

No issues raised

Consideration and going forward

Continue with our preferred approach

5.8 SETTLEMENTS- PLACE-MAKING AND DESIGN VISION

	LDP Approach	LDP Approach	Comments
CITY Derry	Continue current 'market-led' development. Do not intervene strategically in leading the city's regeneration.	Strategic leadership and intervention. Incorporate a strong Vision in the LDP for the city's regeneration. Commitment to future detailed Regeneration Framework and / or Supplementary Planning Guidance	Strategic Regeneration Framework to take account of opportunity/regeneration sites such as Ebrington, Fort George, Riverside, Harbour Square and Council-controlled assets.
MAIN TOWN Strabane	Continue current 'market-led' development. Do not intervene strategically in leading the town's regeneration.	Strategic leadership and intervention. Incorporate a strong Vision in the LDP for the town's regeneration. Commitment to future detailed Regeneration Framework and / or Supplementary Planning Guidance	Strategic Regeneration Framework to take account of opportunity/regeneration sites such as the Canal Basin, Smith's Mill, Railway St and traditional town centre area.
LOCAL TOWNS	Continue current 'market-led' development. Do not	Strategic leadership and intervention. Incorporate a strong Vision in	Build upon and sustain existing strengths and assets of these towns.

Preferred Options Paper: Final Report on Representations Received

<p>Castledearg, Newtownstewart, Claudy</p>	<p>intervene strategically in leading the towns' regeneration.</p>	<p>the LDP for the towns' regeneration. Commitment to include a Design / Place-making Vision Statement in the LDP for each town.</p>	
<p>Sion Mills</p>	<p>Continue current 'market-led' development. Do not intervene strategically in leading the settlement's regeneration.</p>	<p>Strategic leadership and intervention. Incorporate a strong Vision in the LDP for its regeneration. Commitment to include a Design / Place-making Vision Statement in the LDP.</p>	<p>Recognise the specific heritage qualities of the settlement and acknowledge other heritage initiatives carried out by the Council.</p>
<p>Villages</p>	<p>Continue current 'market-led' development. LDP Commitment to include a Design / Place-making Vision Statement in the LDP – for Villages tier.</p>	<p>Strategic leadership and intervention. Incorporate a strong Vision in the LDP for the villages' regeneration. Commitment to future detailed Regeneration Framework and / or Supplementary Planning guidance.</p>	<p>Be aware of the context, character and setting of our villages and encourage a good standard of design that acknowledges all of these</p>
<p>Small Settlements</p>	<p>Continue current 'market-led' development. LDP Commitment to</p>	<p>Strategic leadership and intervention. Incorporate a strong Vision in the LDP for the</p>	<p>Be aware of the context, character and setting of our small settlements and encourage a good standard of design that</p>

Preferred Options Paper: Final Report on Representations Received

	include a Design / Place-making Vision Statement in the LDP – for this tier.	settlements' regeneration. Commitment to future detailed Regeneration Framework and / or Supplementary Planning guidance.	acknowledges all of these
Open Countryside	N/A		Good design standards, as set out in 'Building on Tradition'

Issues Raised

- Would prefer to see more than a Vision for each area – perhaps more detailed guidance / principals
- 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
- The LDP should set out an ambitious spatial plan which; 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
- 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
- Welcome this and visions should include protection and enhancement of distinctive landscape character, views and setting
- 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
- DCSDCs development control role will be fundamental to better design and place making in the life of the LDP
- Emphasis on Place-making and design will result in a quality built environment;
- 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.

-Relevant urban guidance / supplementary planning policies / DCANS to be included and promotion of Lifetime Neighbourhoods principles.

-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.

-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

-It is already too late for some of our settlements, nevertheless, damage can be mitigated by introducing good quality design at this late stage

-Little evidence on how LDP purposes to use urban design to mitigate and adapt for climate change;

-Urban Design/Places. Prefer preferred option. Include high quality design of spaces: street, squares, parks, riverside walkways and their enclosing buildings.

Consideration and going forward

The approach taken was broadly welcomed, however a number of responses believed that the vision should not be limited to certain areas and that we should instead apply standards of good design and place-making across all areas of our City and District.

There was also a message coming through that an approach to design and place-making should go beyond a vision and Council should consider guidance and policy. It was also suggested that we critically examine previous approaches and where necessary decide a better approach in the future.

6.0 Final POP Representations Consideration and Response

6.1 Between the Interim Representations Report and the final draft of the Plan Strategy for public consultation, the issues raised by the POP representations have been further considered and where necessary or where a commitment was given at that stage to do so, further study has been carried out. The outcomes of this further consideration / study and the final LDP response are set out below. For details of the issues raised please refer back to the corresponding part of Section 5.0.

Topic	Final Consideration
LDP Vision and Objectives: Economic, Social and Environmental	<p>It was agreed there is merit in a bespoke LDP vision and so the vision within the draft Plan Strategy is more spatial and locally distinctive.</p> <p>There has also been a review of the wording of the objectives and they have been updated to reflect the approach of the draft Plan Strategy.</p>
Growth Strategy	<p>Further work has been done on the Evidence Base and effort has been made to show clearly the links to the LDP Plan Strategy proposals and policies. Statistical information has been updated, the District survey information updated and an additional study has been undertaken by UU EPC for the Council – to consider the population scenarios related to the Districts SGP implementation.</p> <p>The LDP takes account of the RDS, SPPS, etc and largely follows their thrust / policies and attempts to coherently explain any perceived departures. The final PS SA report will consider the sustainability of the PS Growth Strategy, including alternatives.</p> <p>Issues raised on the quality and nature of underpinning data are particularly significant in terms of soundness – so additional evidence has been assembled.</p>

	<p>Site / settlement-specific issues that were submitted will be considered at the Local Policies Plan (LPP) stage. Council will consider all points raised before finalising</p>
<p>Spatial Strategy: Spatial Distribution & Settlement Hierarchy</p>	<p>The Spatial Strategy has a focus on Derry and Strabane (as the upper tiers), but with opportunities for development across the other tiers and countryside.</p> <p>Further evidence has been gathered to support the Spatial Strategy including a Stage 2 Settlement Appraisal and the NW Transport Study.</p> <p>The Spatial Strategy recognises aims for sustainable development in the countryside, by getting the balance between sustaining vibrant rural communities and protecting the environment of the countryside – with high technical standards for water, etc</p>
<p>Economy: Economic Development Land</p>	<p>There was strong support for the Preferred Option in terms of re-evaluating all existing zonings. Representations highlighted the need for a robust evidence base to back up the Preferred Option</p> <p>A Stage Evaluation 1 evaluation of our existing economic land as well as an Economic Land Monitor have been carried out in order to assess and evaluate our approach at Draft Plan Strategy Stage.</p> <p>The suitability of the evolving requirements and needs of the economy were considered and are reflected in the designations and policies.</p> <p>Matters relating to specific land uses and their effects on existing land uses have been considered. It has been recommended at LPP stage that key site requirements or zoning for particular uses will be considered.</p>
<p>Economy: City and Town Centres</p>	<p>It was noted that there was broad support for the Preferred Option of having a ‘City / Town Centre’ first approach.</p> <p>Representations supporting an alternative approach were received, with some supporting out of centre locations.</p>

	<p>The findings of the Retail Capacity and Town Centre Health Check Report, have informed the strategy and policy for this topic and have concluded that that Preferred Option was the most reasonable approach for the LDP to take at Draft Plan Strategy Stage.</p>
<p>Economy: Retailing Capacity</p>	<p>Representations raised the need for a robust evidence base to support the Preferred Option.</p> <p>A Retail Capacity and Town Centre Health Check Study was commissioned in support of the Draft Plan Strategy. The POP representations were a consideration in the preparation of that study and specific issues raised by POP representations were considered.</p>
<p>Economy: Derry City Centre</p>	<p>The main issue raised related to the clarification and definition of the boundary of the 'city centre'.</p> <p>The Retail Capacity and Town Centre Health Check Study considered this issue and the boundary will be confirmed at LPP stage.</p>
<p>Economy: Strabane Town Centre</p>	<p>The main issue raised related to the clarification and definition of the boundary of the 'town centre'.</p> <p>The Retail Capacity and Town Centre Health Check Study considered this issue and the boundary will be confirmed at LPP stage.</p>

<p>Economy: Local Towns</p>	<p>The main issue raised related to the clarification and definition of the boundary of the ‘town centre’.</p> <p>The Retail Capacity and Town Centre Health Check Study considered this issue and the boundary will be confirmed at LPP stage.</p>
<p>Economy: Transport</p>	<p>Significant representations were made to the Transport section in effect stating that the POP did not set transport and active travel at the heart of the LDP. The preferred option in the POP has been brought forward in the PS but has been significantly enhanced and underpinned by the iterative production by DfI of a NWTS which has addressed all the rep issues and ensures that the LDP chapter and policy can serve as a catalyst for modal shift away from private car use to actively delivers on active travel, will integrate development with enhanced public transport and seek to improve health and wellbeing.</p>
<p>Economy: Tourism</p>	<p>Since publication of the POP the Council’s Tourism Strategy has been published and the proposed strategy and policies have taken account of the evidence and issues provided in this document to reflect the local tourism issues in the District. The overall aim is to promote tourism as an economic driver at the same time as protecting our most important assets such the Historic Walls and the Sperrin AONB from inappropriate development. Our policies cover tourism in both the urban and rural area and the evidence has taken account of the key issues including a positive encouragement to approve accommodation and attract visitors to the rural area, subject to certain criteria. The policies are more local with reference to new tourism facilities such as ‘glamping’ and are positive policies to enable a sustainable and growing tourism industry in the North West.</p>
<p>Economy: Minerals Development</p>	<p>POP representations generally backed 2 opposing views. There was the view that the Preferred Option would be potentially limiting in relation to Minerals extraction. The other view taken was that the Preferred Option was not suitably restrictive and would impact negatively on the environment.</p> <p>Both views were considered and on balance it was felt that the Preferred Option would provide for adequate Mineral extraction opportunities over the LDP period, whilst also providing protection to the acknowledged areas of environmental importance through ‘Areas of Constraint for Mineral Development</p>

<p>Economy: Rural Economy</p>	<p>Representations included a balanced approach to the rural economy, which would allow an appropriate level of the rural economic development. This approach is reflected in the Draft Plan Strategy through the carry forward of economic policies relating to the rural areas from SPPS, as well the provision of new opportunities for small scale economic businesses.</p>
<p>Social Development: Strategic Housing Distribution</p>	<p>There was support shown for all 3 options within the responses received. It was recognised that there was a greater amount of interest and a much greater level of additional consideration. All 3 options were considered and further evidence indicated that there should be a balanced growth across the District's settlement hierarchy. The Strategic Growth Plan aspires to grow Derry City and Strabane District by approx. 12,000 additional households (2017-2037). The aspiration of this LDP is to be the spatial outworking of our Strategic Growth Plan and from this, the Council aims to provide sufficient land over the LDP period (2017-2032, 15 years) to meet this housing requirement. There has been a further review and continued refinement of the Housing Monitor and of the Urban Capacity (UC) figures, including windfall figures. In many of our settlements, the number of existing commitments is sufficient to meet the housing requirement up to 2032 and even beyond. It will only be after these commitments are delivered that a requirement will emerge for the phased release of selected site for housing. As such, the on-going monitoring of housing delivery will be vital to allow for the proper phased and managed release of selected Phase 2 sites.</p>
<p>Social Development: Housing Allocation Quantum</p>	<p>The settlement evaluation information plus the LDP Spatial Strategy has been used to produce an indicative allocation of houses for each settlement over the LDP period. It is an indicative allocation relative to the current proportion of households (dwellings) or population in each tier; the allocations are further broken down for each of the District's settlements and the countryside. In nearly all settlements, there is ample housing land capacity, so the LDP is confident that the indicative numbers of dwellings can be delivered.</p>
<p>Social Development: Location and Allocation of Housing Land</p>	<p>There was significant support for Option 3 and it was presented that this approach was the most desirable in terms of sustainability. However there was also notable recognition that preferred Option 2 took into account the legacy of the previously zoned housing land and in particular the commitment in the form of planning approvals. An initial exercise as</p>

	<p>per DFIs comments to evaluate zoned housing land was carried out and in 2018, known landowners of undeveloped zoned housing land within the District were contacted via a written questionnaire. The purpose of this was to confirm ownership and to seek confirmation on the likelihood of the land coming forward for development. In villages and small settlements there are proposed Land Use Policy Areas (LUPAs) which will be designated for housing and certain other uses including community uses, open space and economic development, all appropriate to the scale of the settlement. These LUPAs will be designated based on a number of considerations at LPP stages.</p>
<p>Social Development: Affordable Housing and Balanced Communities</p>	<p>We have worked closely with NIHE. Their most recent report ‘NIHE 15 year Social Housing Need Assessment to 2032’, has given a figure of 4,750 social housing units required over the plan period. We have taken account of other evidence provided to inform new polices on affordable housing, Lifetime homes and house type and tenure and travellers accomodation so that we can get the appropriate thresholds in all new housing developments to meet the aim of providing balanced communities to meet the housing need/demand of social and mixed communities in both the urban and rural parts of the District.</p>
<p>Social Development: Open Space / Recreation</p>	<p>The POP option remained the same. There has been extensive work on the evidence base to provide a baseline on the provision of the open space in the District as per Appendix A of PPS 8. Since the POP there has been a draft Council Pitches Strategy and a Green Infrastructure Plan of the District published which have been considered as important evidence for consideration. A Play Plan has been commissioned by the Council which will further update the evidence base at the Local Policies Plan. We have carried out an audit of the existing zoned open space as per the DAP and SAP and the Council’s play parks. Proposed open space zonings will be proposed at the Local Policies Plan stage. In terms of the protection of open space, this will remain as per the SPPS. New policy for green and blue infrastructure has been provided as well as the introduction of SuDS into the policy. The draft pitches strategy considers the provision of Gaelic pitches in the District (specific mention of Gaelic pitches in POP representations). Overall the issues raised at the POP were relevant and were taken into consideration in the open space, sport and recreation strategy and the policies.</p>

<p>Social Development: Community Infrastructure</p>	<p>The PS policy direction reflects and maintains the preferred option. A sound baseline has been produced as part of the EVB in line with POP reps. The strategy will be to facilitate development through a policy framework that will be generally permissible for new or improved community infrastructure. Such an approach will be subject to ensuring that any new facilities are accessible to the community that they seek to serve e.g. a proposal for new community centre should be located so that it is accessible by foot, cycle and where possible by public transport. This is in line with the extensive liaison that has been undertaken with relevant CI providers and is particularly relevant to the larger zonings.</p>
<p>Social Development: Waste</p>	<p>Waste policies are very technical and must strictly adhere to waste legislation. The LDP is guided by the Waste Management Strategy (WMS) and the Waste Management Plan (WMP).</p> <p>The draft Plan Strategy recognises the circular economy, in its waste management strategy as set out in the waste management chapter.</p> <p>Appropriate remediation of contaminated sites is supported and the General Development Principles and Policies chapter makes provision for development on or adjacent to contaminate sites.</p> <p>Proposed policy allows for waste management facilities where a need is identified and subject to other material considerations.</p>
<p>Environment: Natural Environment</p>	<p>The proposed strategy of the LDP PS reflects the regional strategy as set out in the RDS and the SPPS. The strategy has also been influenced by the aims of the District's Strategic Growth Plan which seeks to enhance our natural environment through biodiversity action planning and landscape scale conservation projects to protect and enhance our natural environmental assets.</p> <p>Overall, this maintains the policy course as set out by the Preferred Option 1 in the POP and reflects the range and nature of the POP representations received. Consideration was given to those POP representations that indicated a preference for Option 2 (Option</p>

	<p>1 + additional local designations). There was not considered to be any planning / nature conservation benefit in designating such SLNCI style designations which carry in effect no environmental protection. Accordingly this was not taken forward in the PS.</p>
<p>Environment: Landscape Character</p>	<p>The PS policy reflects the Preferred Option set out in the POP. POP reps were mostly balanced between those voicing support for landscape recognition and protection across the District and those who considered such protection may preclude certain operational activities – mineral extraction / renewables.</p> <p>Policy preparation has been enhanced by the undertaking of a Landscape Character which highlighted new / emerging forces of change in our landscape / seascape and the need for landscape protection in sensitive areas of the District. This also reflects landscape representations made to the POP.</p> <p>The visual impact of wind farms along with the cumulative impact of individual single turbines was also considered in terms of landscape capacity. The Review considered that while particular areas were reaching capacity in the SW of the District and were visually dominant along stretches of the skyline adjacent to the A2 and A5, it would not be appropriate to designate blanket bans on these areas. WECA designations have been brought forward as a result. A specific river policy NE 4 has been included within the Natural Environment Chapter which seeks to protect the character, views and access in relation to our main rivers. This is also in line with POP representations.</p>
<p>Environment: Coastal Development</p>	<p>A small number of POP reps were received seeking that the dPS took forward the SPPS and referenced emerging Irish Maritime policy. This has been taken into account and the policy thrust of the PS chapter fully delivers on these representations.</p>
<p>Environment: Built Environment / Heritage (Historic Environment)</p>	<p>The PS Chapter and policy maintains the preferred option from the POP and articulates why it was not possible to facilitate those representations that sought for bespoke policy to protect unlisted, locally important buildings. The PS policy reflects the desires of those seeking the protection of our built heritage and its associated setting which contributes significantly to the District's economy.</p>
<p>Environment: Urban Design / Places</p>	<p>A Place-making and Design Study was commissioned for the LDP and has informed this aspect the LDP.</p>

<p>Environment: Renewables & Solar</p>	<p>This study considered the POP representations received in relation to this topic</p> <p>The Preferred Option has largely prevailed in that sensitive landscapes will be protected through the use of WECAs; however there is still scope for appropriate renewable energy development where the relevant criteria can be met. It is considered a balanced approach is being pursued.</p> <p>The Renewable Energy Policy has been amended so that it now contains detailed provisions for anaerobic digesters and hydroelectric schemes, in addition to those for wind and solar power.</p> <p>The resulting Renewable Energy chapter and other chapters such as General Development Principles and Policies, address climate change as a priority issue.</p> <p>Evidence has been updated and a landscape study was carried out to review landscape character areas.</p>
<p>Environment: Flooding</p>	<p>The draft Plan Strategy has adopted the approach of the Preferred Option. While further consideration was given to removing some of the exceptions, following multiple consultations with DfI Rivers it was considered this is not practical and could have implications for essential strategic development.</p> <p>The General Development and Principles (GDP) chapter contains several provisions for flood alleviation including tree planting and a requirement for SuDS where feasible.</p> <p>The Flooding, GDP and Renewable Energy policies all incorporate provisions to address climate change as it has significant impact on flooding.</p> <p>Further work will be done on this in relation to avoiding zoning flood prone lands for inappropriate development at LPP stage.</p>
<p>Environment: Transport – Environmentally and people friendly</p>	<p>Significant representations were made to the Transport section in effect stating that the POP did not set transport and active travel at the heart of the LDP. The preferred option in the POP has been brought forward in the PS but has been significantly enhanced and underpinned by the iterative production by DfI of a NWTS which has addressed all the</p>

	<p>representation issues and ensures that the LDP chapter and policy can serve as a catalyst for modal shift away from private car use to actively delivers on active travel, will integrate development with enhanced public transport and seek to improve health and wellbeing.</p>
<p>Settlements – Place-making and Design Vision: CITY</p> <p>Derry</p>	<p>A Place-making and Design Study was commissioned for the LDP and has informed this aspect the LDP. This study considered the POP representations received in relation to this topic.</p>
<p>Settlements – Place-making and Design Vision: MAIN TOWN</p> <p>Strabane</p>	<p>A Place-making and Design Study was commissioned for the LDP and has informed this aspect the LDP. This study considered the POP representations received in relation to this topic.</p>
<p>Settlements – Place-making and Design Vision: LOCAL TOWNS</p> <p>Castlederg, Newtownstewart & Claudy</p>	<p>A Place-making and Design Study was commissioned for the LDP and has informed this aspect the LDP. This study considered the POP representations received in relation to this topic.</p>
<p>Settlements – Place-making and Design Vision:</p> <p>Sion Mills</p>	<p>A Place-making and Design Study was commissioned for the LDP and has informed this aspect the LDP. This study considered the POP representations received in relation to this topic.</p>
<p>Settlements – Place-making and Design Vision: Villages</p>	<p>A Place-making and Design Study was commissioned for the LDP and has informed this aspect the LDP. This study considered the POP representations received in relation to this topic.</p>
<p>Settlements – Place-making and Design Vision: Small Settlements</p>	<p>A Place-making and Design Study was commissioned for the LDP and has informed this aspect the LDP. This study considered the POP representations received in relation to this topic.</p>
<p>Settlements – Place-making and Design Vision:</p>	<p>A Place-making and Design Study was commissioned for the LDP and has informed this aspect the LDP.</p>

Open Countryside	This study considered the POP representations received in relation to this topic.
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7.0 Conclusion

- 7.1 This Final POP Representation Report has outlined how public consultation in relation to the Council's Preferred Options Paper (POP) complies with Regulation 11(4) of the Planning (Local Development Plan) Regulations (Northern Ireland) 2015. It also provided clarification in relation to the processes involved in publicising and promoting the consultation for the Preferred Options Paper both in terms of public consultation and liaising with statutory and non-statutory consultation bodies.
- 7.2 From a presentational viewpoint, Council's POP document was well received in terms of its readability, layout and clarity. The clear and legislatively required relationship with the Strategic Growth Plan was positively commented on. This feedback is one that Planning officials can proactively build on in preparing the layout and content of the draft Plan Strategy document.
- 7.3 In terms of issues raised, respondents were broadly supportive of the thrust, sustainability approach and main text of the POP document and its supporting documents.
- 7.4 It has been noted that Planning extends beyond land-use to integrate policies for the development and use of land with other key policies and programmes which influence the nature of places and how they function. All necessary engagement and discussion with relevant Government Departments, consultees, agencies and other interested parties has been undertaken to ensure that a robust and current evidence base has been gathered and a fully rounded and transparent consideration of all issues and viewpoints has taken place.
- 7.5 The broad nature of responses to the Options as presented in the POP can be categorised as follows; either:
- Supportive of the preferred option (with / without supplying supporting evidence);
 - Not supportive of the preferred option and a preference for another Option (with / without supplying supporting evidence);
 - Or Seeking additional, robust baseline evidence / further studies to underpin future decision making.
- 7.6 The following Key Topic areas received a greater amount of interest and will required a much greater level of additional consideration, namely
- Economic** – Economic Development Lands, City / Town Centres, Transport, Rural Economy, Minerals;
- Social** – Strategic Housing Distribution, Location & Allocation of Housing Land; Sociable / Affordable Housing & Balanced Communities;

Environment – Natural / Historic Environment, Landscape, Urban Design, Renewables, Transport – People & Environmentally Friendly, Settlements – Place Making & Design Vision.

These Topics dovetail into the key findings emanating from the Strategic Growth Plan in terms of those key areas seen as drivers to the economic regeneration and social improvements required to enable this District to fully deliver its ‘North West City Region’ role and fully maximise its potential to the benefit of its citizens.

7.7 All of the suite of Planning Policy Statements were opened up for representations to be made during the consultation period. The broad nature of responses can be categorized as follows; either:

- Retain the policy in each PPS as is;
- Relax the contained policy within each PPS;
- Stricter policy controls required over and above that already contained in the PPS;
- A general desire to see Council more rigorously enforce the application of policy.

The following Planning Policy Statements received a particular level of interest namely,

PPS13 – Transportation & Land Use

PPS 18 – Renewable Energy

PPS 21 – Sustainable Development in the Countryside. PPS 21 attracted the greatest level of response with issues raised divided into requests to have the future LDP rural planning policy either, retained as per PPS21, relaxed or alternatively made stricter.

7.8 The POP and SA (EQIA and RNIA) consultation with statutory bodies and the public has demonstrated that there was a wide range of different views expressed regarding the Council’s Preferred Options. Overall, while there was much support for Council’s Preferred Options for the proposed LDP, certain topic areas attracted significant comment and raised issues that required further consideration, additional studies or analysis of supplied supporting baseline data. Any actions / agreement arising out of these issues raised needed to be factored against the various Soundness tests, against which the LDP will be scrutinised at the Independent Examination (IE). In particular, any LDP actions emanating out of the issues consideration that could be perceived to be contrary to current regional planning policy needed to be underpinned by a sound and robust evidence base to justify their inclusion in the Plan Strategy.

APPENDIX – Information about the POP Launch and Consultation

Consultation Launch Event held 30th May 2017.



From back left to right: Cllr Kieran Maguire, Cllr Thomas Kerrigan, John Kelpie (Chief Executive, Derry City and Strabane District Council), Cllr Gus Hastings, Maura Fox (Head of Planning). From front left to right: Karen Philips (Director of Environment and Regeneration, Mayor Hilary McClintock, Cllr John Boyle (Chair of Planning Committee).



Launch of LDP Preferred Options Paper 2017, 30 May 2017. From Left to right – Maura Fox (Head of Planning), John Kelpie (Chief Executive, Derry City and Strabane

District Council), Mayor Hillary McClintock, Cllr John Boyle (Chair of Planning Committee), Karen Philips (Director of Environment and Regeneration).

Information Leaflet:

Public Consultation Workshops on Strategic Growth Plan (Community Plan)

& LDP Preferred Options Paper (POP)

for Derry City & Strabane District



The Strategic Growth Partnership for Derry City & Strabane District, together with Derry City and Strabane District Council have jointly launched two important documents designed to improve the social, economic and environmental well-being of our City and District.

The draft, Inclusive Strategic Growth Plan is open for consultation until **Friday 15th September 2017**. The details can be accessed at Council Offices and at www.derrystrabane.com/communityplanning

The Preferred Options Paper for the Local Development Plan 2032 (LDP) is open for consultation from **Wednesday 31st May until Tuesday 22nd August 2017**; the details can be accessed at Council Offices and at www.derrystrabane.com/ldp

A series of public consultation events will be held across the City and District during June 2017, to engage local stakeholders on the proposals within both documents, as follows:

Location	Evening Meeting (LDP & SGP - Strategic Growth Plan)	Daytime Workshop (focussed on LDP, as well as SGP)
Guildhall, Derry	Tues 6th June @ 7pm	Wed 7th June, 2pm - 4pm
Alley Theatre, Strabane	Wed 7th June @ 7pm	Fri 9th June, 2pm - 4pm
Ulster University @ Magee, Great Hall	Tues 13th June @ 7pm	
The Glen Community Centre, Derry		Thurs 15th June, 3pm - 5pm
Claudy Community Centre	Thurs 15th June @ 7pm	Fri 16th June, 2pm - 4pm
Derg Valley Leisure Centre, Castledearg	Mon 19th June @ 7pm	Tues 20th June, 11.15am - 1pm
Amnity House Donemana	Tues 20th June @ 7pm	Wed 21st June, 2pm - 4pm
Skeoge House, Leafair, Derry	Thurs 22nd June @ 7pm	Fri 23rd June, 2pm - 4pm
St. Columb's Park House, Derry	Tues 27th June @ 7pm	Wed 28th June, 2pm - 4pm



Everyone is welcome to attend these meetings and events.
For further information please visit www.derrystrabane.com





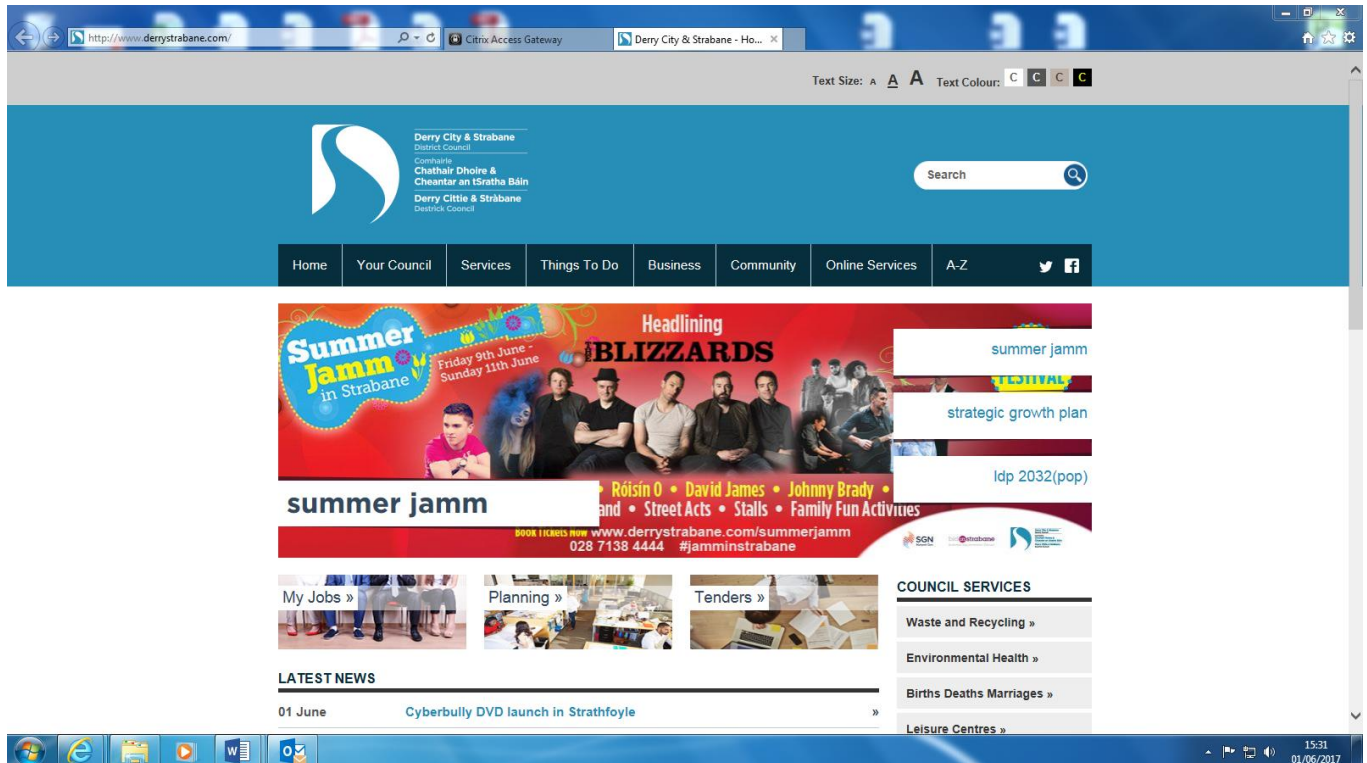
Photos of Banners and Display Table at Reception, Derry City and Strabane District Council



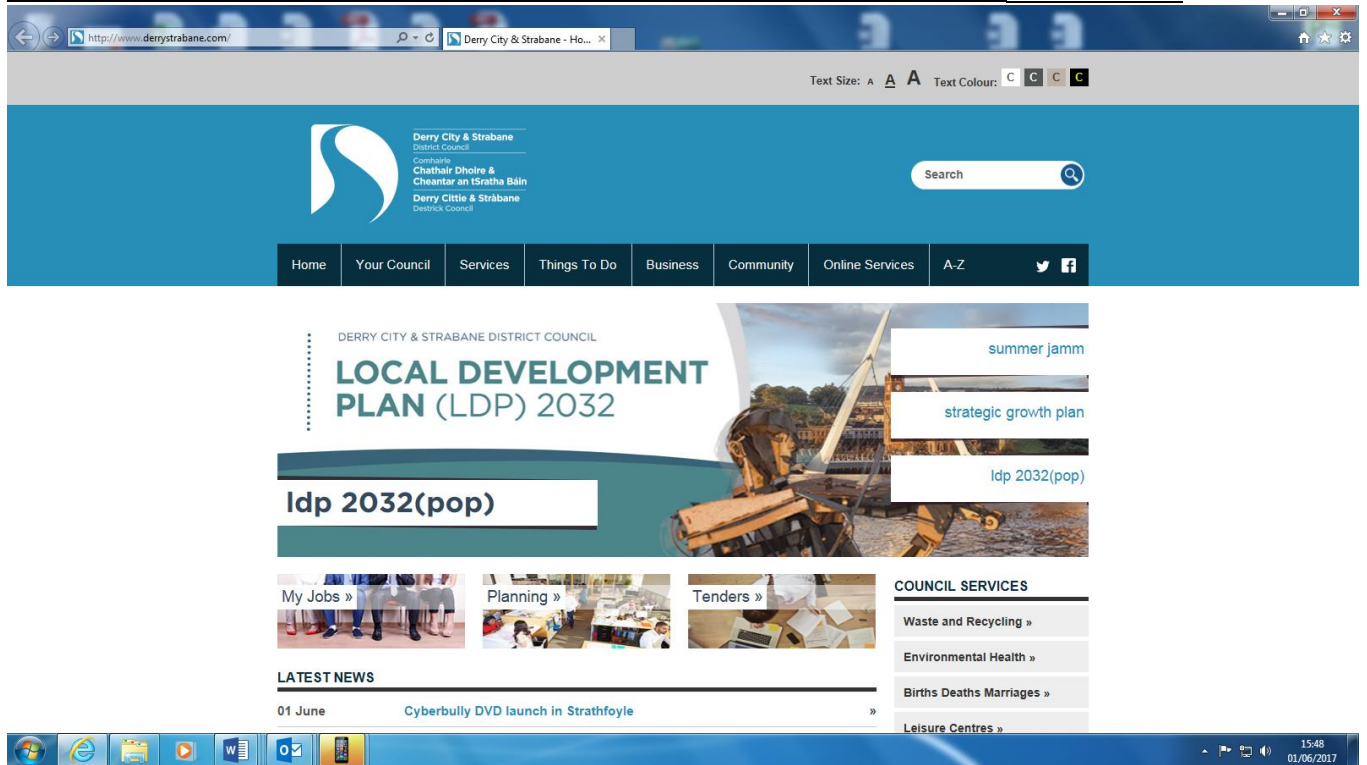
Preferred Options Paper: Final Report on Representations Received

- | | |
|-------------------------|------------------------------|
| 1. Derry Journal | 30.05.2017, 2 week placement |
| 2. Londonderry Sentinel | 31.05.2017 2 week placement |
| 3. Strabane Chronicle | 01.06.2017 2 week placement |
| 4. Strabane Weekly News | 01.06.2017 2 week placement |
| 5. Tyrone Constitution | 01.06.2017 2 week placement |
| 6. Ulster Herald | 01.06.2017 2 week placement |

Print Screens (1st June 15.34) below of Derry City and Strabane District Councils Main Home Page with the LDP POP link displayed on the right hand side. The two front screens were on timed rotation.



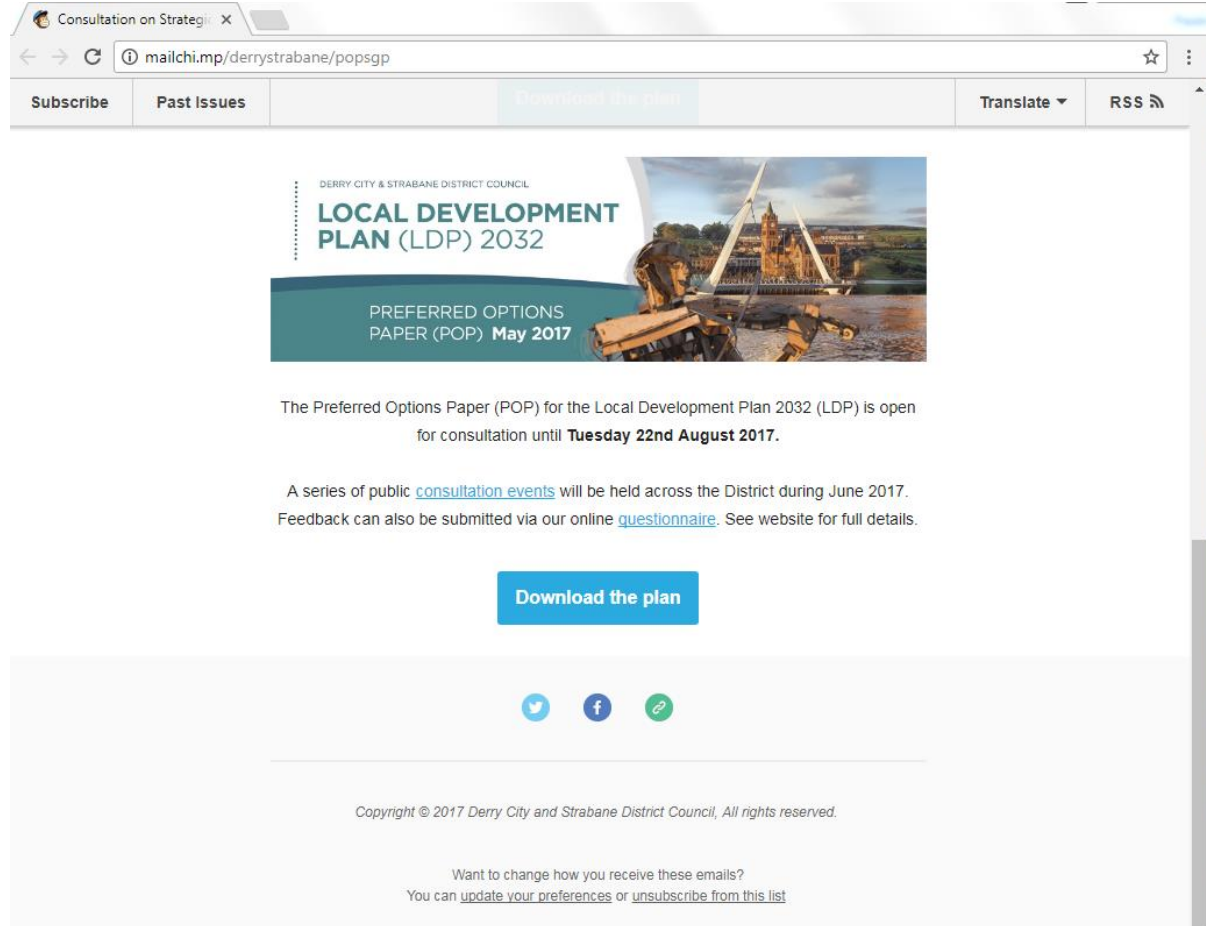
Preferred Options Paper: Final Report on Representations Received



The screenshot shows a web browser window displaying the website for Derry City & Strabane District Council. The browser's address bar shows the URL <http://www.derrystrabane.com/>. The website header includes the council's logo and name in both English and Irish, along with a search bar. A navigation menu contains links for Home, Your Council, Services, Things To Do, Business, Community, Online Services, and A-Z. The main content area features a large banner for the 'LOCAL DEVELOPMENT PLAN (LDP) 2032' with a background image of a boat. Below the banner, there are three buttons: 'summer jamm', 'strategic growth plan', and 'ldp 2032(pop)'. A section titled 'LATEST NEWS' shows a news item dated '01 June' about a 'Cyberbully DVD launch in Strathfoyle'. On the right side, there is a 'COUNCIL SERVICES' menu with links for 'Waste and Recycling', 'Environmental Health', 'Births Deaths Marriages', and 'Leisure Centres'. The Windows taskbar at the bottom shows the system tray with the time '15:48' and date '01/06/2017'.

Print Screen of the EZine:

Preferred Options Paper: Final Report on Representations Received



Consultation on Strategic: X

mailchi.mp/derrystrabane/popsgp

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DERRY CITY & STRABANE DISTRICT COUNCIL
LOCAL DEVELOPMENT PLAN (LDP) 2032
PREFERRED OPTIONS PAPER (POP) May 2017

The Preferred Options Paper (POP) for the Local Development Plan 2032 (LDP) is open for consultation until **Tuesday 22nd August 2017**.

A series of public [consultation events](#) will be held across the District during June 2017. Feedback can also be submitted via our online [questionnaire](#). See website for full details.

[Download the plan](#)

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List of Section 75 Names

Action on Hearing Loss	Eglinton Community Association
Active Citizens Engaged	EGSA
African Caribbean Group	First Housing Aid and Support Services (FHASS)
Age Friendly (Derry and Strabane) C/o Derry Health Cities	Foyle Cruse Bereavement Care
Ailsa Bratton	Foyle Deaf Centre
All Saints Caring Association	Foyle Downs Syndrome Trust
Ancient Order of Hibernians	Foyle Family Heritage Centre
Apprentice Boys of Derry	Foyle Haven
Baha' I Faith	Foyle New Horizons
Ballymacgroarty and Hazelbank Community Partnership	Foyle Trust for Integrated Education
Ballymagroarty Community Assoc/Youth Assoc.	Foyle U3A
Bond Street Community Association	Foyle Women's Aid
Bridge Accessible Transport	Foyle Women's Information Network
CALMS	Gael Phobal
Carnhill Community Centre	Galliagh Community Development Group
Carnhill Resource Centre	Gasyard Development Trust
Caw Nelson Drive Action Group	Gingerbread (NI)

Preferred Options Paper: Final Report on Representations Received

Cheshire House	Greater Shantallow Area Partnership
Church of Ireland	Habinteg Housing Association
Citizens Advice Bureau	Hands That Talk
City of Londonderry Grand Orange Lodge	Holywell Trust
Claudy Rural Development Group	Hungarian-Irish Network
Clooney Family Centre	HURT
Community Development Learning Initiative	Ilex URC
Community Restorative Justice (NW Region)	Inner City Trust
Council for the Homeless (NI)	Irish Street Community Association
Creggan Enterprises Ltd	Law Centre NI
Creggan Neighbourhood Partnership	Leafair Community Association
Creggan Pre-School and Training Trust (CPTT)	Learmount Community Development Group
Cultúrlann Uí Chanáin	Lettershandoney and District Development Group
Cumann Gaelach Chnoc na Ros Doire	Lilliput Theatre
CUNAMH	Londonderry Methodist City Mission
Curryneran Community House	Londonderry YMCA
Derry Northside Development Trust	Long Tower Youth and Community Centre
Derry Travellers Support Group	MENCAP
Derry Well Women	Mens Action Network
Derry Youth and Community Workshop	Methodist Church in Ireland
Destined	Methodist City Mission
Destined (Feeny)	Monreagh Ulster Scots Heritage Centre
Disability Action	Mrs Sue Divin
Disability Equality NI	Multiple Sclerosis Society (Foyle Branch)
Disability Equality NI	National Autistic Society
Newbuildings Community and Environmental Assoc	Sion Swifts F. C.
NEXUS Institute	Sollus Centre
NI Association for Mental Health	St Columb's Park House Peace & Reconciliation Centre
NI Chest, Heart and Stroke Association (Local)	STEER
NIACRO	Strabane Athletic F.C.
NIPPA	Strabane Ethnic Community Association
NIPSA	Strabane Volunteer Centre
NIPSA Branch 536	Strand Foyer
North West Housing Ltd	Stroke Organisation
North West Migrants Forum	Talking Newspaper
North West Volunteer Centre	The Cedar Foundation
Northern Ireland Chest Heart and Stroke	The Junction
Northern Ireland NEWPIN	The Women's Centre
Northlands Centre	Traveller Development Officer
NSPCC	Triax Neighbourhood Partnership Board
NW Community Network	Ulster Scots Community Network
NW Forum of People with Disabilities	UNITE
Off The Streets	USEL

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Older People North West	Verbal Arts Centre
Outer North Neighbourhood Partnership	Victim Support Northern Ireland
Outer West Neighbourhood Partnership	VOYPIC
Partnership Care West	Waterside Area Partnership
Pat Finucane Centre	Waterside Women's Centre
Peace and Reconciliation Group	West Bank Initiative
Praxis	Women's Institute
Presbytery of Derry and Donegal	
Probation Board for Northern Ireland	
R.E.A.L. Network	
Rainbow Project	
Residents Committee Park West	
Riversdale Otters A.S.C,	
RNIB Resource Centre	
Rosemount Resource Centre	
Rural Area Partnership in Derry	
Rural North West Community Support	
SALT Community Association	
SDLP Local Office	
Sensory Support Service	
Shamrock Hurling Club	
Sigersons Ladies GAA Club	
Sikh Cultural Centre	
Sikh Cultural Centre	
Simon Community	