

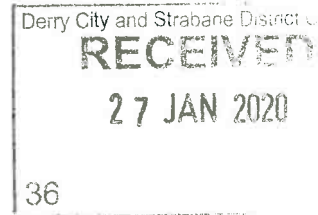
Chloe Duddy

From: enagh forum <enaghyf@gmail.com>
Sent: 27 January 2020 10:55
To: Local Development Plan
Subject: Draft LDP (RNIA Response)

Please acknowledge receipt of this correspondence.

Kind regards,

Paul Hughes
Youth & Community Development Worker
Enagh Youth Forum



I am a youth and community development worker currently employed with Enagh Youth Forum; a grassroots community group working across the rural Enagh wards of the 'rural' Faughan DEA of Derry City & Strabane District Council area.

I wish to submit this representation on behalf of the management committee of Enagh Youth Forum, 6 Parkmore Drive, Strathfoyle, Derry, BT476XA.

This representation is in relation to the 'Draft Rural Needs Impact Assessment' (RNIA)

For the past number of years when we have sought to raise our communities concerns in relation to what many view as the 'over-industrialisation' of our rural community we have been consistently advised by elected reps and decision makers to ensure we put forward our thoughts as part of the Local Development Plan Consultation.

This is what I am trying to do through this representation. Unlike many of the big property developers and big industrial companies we do not have the finances or resources to employ planning consultants to outline our concerns for us. Never the less we are determined to utilise this opportunity to stand up for our rural communities which have often been negated by planners for far too long. In recent years our community has had to fight to oppose plans to force upon us a fish processing plant and waste gasification facility (That of course on top of everything that already exists in the local area). There has and continues to be zero consultations within the local residents of Starthfoyle and Maydown regarding these major industrial developments. Indeed even now as I type this submission there is a construction project underway in our local area that none seems to know anything about on Haw Road (also within what this LDP describes as The Harbour Development Zone). Neighbourhood notification and consultation with local residents was also identified as an issue within the Ben Cave Health Impact Assessment Report 2015. When will Council and the planners and the Northern Ireland Strategic Infrastructure Planning departments take these issues seriously. There can be no further industrialisation of our rural community without proper consideration of the adverse impact already being experienced by local residents as a result of residing beside high industry including a number of health concerns. We are not against economic development; all we are asking for is proper consultation and consultation and for ethical investment that takes full account of all the existing industry and finds a proper balance between our right to a rural home and a rural community and the proximity of our rural home and community to high industry.

through the Local Development Plan consultation. Having read this document I am concerned that this document does not adequately understand the current needs of the Strathfoyle and Maydown communities.

Strathfoyle is designated as a rural village.

Strathfoyle is situated adjacent to one of the biggest industrial areas in Northern Ireland including Foyle

Port, Lisahally & Maydown.

In the context of this document does the Rural Needs Impact Assessment define and include Lisahally and Maydown as rural?

For these past number of years local residents in Strathfoyle and Maydown have raised concerns in relation to the high levels of industry that now exist in close proximity to their villages, to their homes and to their rural communities.

Some of these concerns, experiences and views are documented and recorded in the Ben Cave Health Impact Study (2015) document. This study was commissioned by the then Derry City Council and subsequently adopted by Derry City & Strabane District Council who agreed to work towards the full implementation of all the reports recommendations. This document concluded that local residents of Strathfoyle and Maydown experience some negative adverse impacts as a direct result of residing in close proximity to high industry. The study further questioned the 'culmative' impact of such large clusters of industry and potential negative impacts on local residents.

Giving that this document sets out to assess and identify rural needs as part of the wider local development plan; we feel strongly that this document commissioned and adopted by Derry City and Strabane District Council should have been looked at and included in the range of information sources used in the formative stages of POP and DPS preparation. This was something Enagh Youth Forum had requested at the POP stage. There is no doubt that the economic considerations of future industrial development in these areas have been considered in what the LDP describes as the 'Harbour Development Zone'.

Why was this document not included at the formative stages giving that it specifically relates to the rural needs of two rural communities of Derry City and Strabane District Council area and also giving the fact that these rural communities are adjacent to an area of high industrial development namely Lishally, Maydown Industrial Estate and what the LDP is now calling the 'Harbour Development Zone'.

Does this Draft Rural Needs Impact Assessment recognise that Strathfoyle and Maydown are rural communities?

Does this Draft Rural Needs Impact Assessment recognise that the industrial economic areas are also 'rural' and exist adjacent to the rural communities of Strathfoyle and Maydown?

1.2

The Rural Needs Act 2016, requires District Councils and other Public Authorities to have 'due regard to rural needs' when developing, adopting, implementing or revising policies, strategies and plans, and when designing and delivering public services. The principles of rural proofing are incorporated in the RNIA process. The RNIA accompanies the LDP draft Plan Strategy and will be subject to consultation prior to an Independent Examination, possible amendment, and then adoption by the Council.

To have due regard for 'rural needs' when it comes to the rural communities of Strathfoyle and Maydown it would appear that council and the planners are still not listening to the expressed needs of our rural communities when it comes to co-existing beside an area of high industry.

1.3

The LDP draft Plan Strategy follows the LDP Preferred Options Paper (POP) (May 2017), which was an earlier consultation document which considered several issues for the district and provided options, including a preferred option, of how these issues could be addressed. There was in excess 147 representations to the POP and these representations have all been considered in the formulation of the LDP dPS.

Can you confirm that Enagh Youth Forum raised similar concerns during the POP stage.

Summary of Issues

1.6 After an intensive period of research and fact finding in the form of evidence position papers, policy reviews, face to face engagements and public consultation, the RNIA has identified the following social, economic and environmental issues as being of particular relevance to the rural area in Derry City and Strabane District Council:

- Whilst most of the population live in the two large urban centres, Derry City and Strabane town, the other 45 settlements would be considered rural. In addition to this, the remainder of the District, outside of settlement limits, would be

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Derry City and Strabane District Council Draft Plan Strategy – Draft Rural Needs Impact Assessment (RNIA)

considered rural. There is a need to ensure that we sustain vibrant rural communities in these rural areas and provide support and appropriate growth is encouraged to enable this;

- This growth can be facilitated via appropriate levels of housing and employment in rural areas, both in the countryside and in our rural settlements;
- The Rural area of Derry City and Strabane District has specific circumstances that need to be considered and facilitate in order to support our rural communities. These issues include a high level of self-employment, entrepreneurship and farmers living and working in our rural area.
- Rural parts of the Derry City and Strabane District have some of the poorest broadband coverage and mobile data coverage in Northern Ireland and this can contribute to social exclusion and isolation;
- Similarly, some rural parts of the Derry City and Strabane District experience travel time to key services like A&E and other acute hospital services which are amongst the highest in Northern Ireland and this also contributes to the perception of rural isolation;
- Loss of services such as schools, banks and post offices in our rural areas; and
- The need to protect our unique landscapes and internationally renowned heritage sites from the impact of inappropriate development.

We feel that giving the close proximity of Strathfoyle and Maydown to existing industrial zones, Recommendation A of the Ben Cave Health Impact Study Report should now be implemented and a balanced plan for this area be co-designed and residents concerns taking on board and where required land within this industrial zone (Derry Area Plan 2011) be reviewed and re-designated to meet the identified needs of our rural communities and ensuring that further industrial developments does not infringe upon the rights of rural communities to co-exist alongside future industrial development.

1.7

Additional criteria allowing houses in the countryside has been included;

- Villages, Small Settlement and the Countryside have been afforded appropriate growth based on their current size and role within the settlement hierarchy to sustain them as vibrant rural communities;
- Policy on economic development in villages, small settlements and the countryside has been made more flexible in order to facilitate growth and to allow the draft Plan Strategy to respond to the specific local needs of Derry City and Strabane District Council;

Protective designations have been included at and around our most valuable landscape and environmental assets in order to protect them from the impacts of development. These designations have been kept to a minimum in order to ensure appropriate protection whilst not impacting unduly upon development opportunities which may exist and which the rural area may benefit from.

Our rural community has already identified a need for more social housing and formally requests that current land designations between Strathfoyle and Maydown and within the proposed industrial zone be reviewed to reflect this. We do not want a future where our two rural communities are divided and separated by even more industrial development. We would advocate the need for land to be re-designated for community infrastructure projects, green spaces, forests and amenity value to meet the emerging needs of our rural communities.

2B The LDP dPS must balance the social and economic needs of the rural area, with the need to protect and enhance the environment in the rural area. The character of our countryside is a major asset to the District and we are caretakers of our unique landscapes e.g. the Sperrin AONB. By introducing strategic

designations to offer protection to our unique landscapes and areas of nature and heritage importance. We would request that as part of this LDP process a balance must be found when developing planning policy for the Strathfoyle/Maydown/Lisahally areas and we are requesting this as caretakers of our unique landscapes.

2B] Derry City and Strabane District Council Draft Plan Strategy – Draft Rural Needs Impact Assessment (RNIA)

2B] well as the introduction of criteria based policies designed to ensure protection from some forms of development, the LDP dPS hopes to achieve this balance between allowing appropriate growth in the rural area, whilst offering a level of environmental protection. These protected areas have been limited to areas which are largely uninhabited and therefore, negative impacts of these designations are not considered to be likely.

We request that as part of this LDP process, Recommendation A of the Ben Cave Health Impact Study 2015 be implemented in full through re-designating and re-zoning lands within this 'economic development zone' to give consideration to the experience and needs of our rural communities.

2C

LDP Social Development objective (b) Accommodating People and Facilitating Communities point (iii) aims to:

'provide for vital and vibrant rural communities.... including in our small settlements...' To that end, the LDP draft PS proposes to:

- identify three local towns to service the more peripheral rural areas; AND
- have a wide number of villages and small settlements, noting their potential for clustering to help ensure a vibrant rural area.

There are some differential impacts associated with development associated with waste management in the rural area. Waste policy can direct certain types of development to rural area e.g. re-use of former mineral sites etc. Given the low likelihood of such developments, the impact is likely to be negligible over the LDP period. Because of the remoteness of some developments there is likely to be no access to mains sewerage and thus non-mains sewerage is required usually through a septic tank. This can have an additional cost attributed to it whilst an accumulation of these types of developments can have an impact on the environment. The same is applicable to public utilities in so far as it relates to water and electricity supply and telecommunications.

We already reside beside a household recycling facility, waste separation and processing facility and biomass power station and many many other industrial sites (Full list detailed within the Ben Cave Health Impact Study Report, 2015) Our rural community is opposed to all forms of gasification and incineration and reserves the right to oppose all future proposals for gasification/incineration within our rural communities and adjacent industrial zones. Local residents already experience a number of adverse negative impacts of residing beside high industry and we feel strongly that any further industrialisation or expansion of industry in this zone must be carried out following strict guidelines and rules, with appropriate community consultation and taking into account the findings of the Ben Cave Health Impact Study, 2015. It is also our understanding that it is the corporate position of DCSDC to oppose gasification and incineration technologies.

3C Policy Reviews

Prior to publication of the LDP POP, it was also important to carry out policy reviews on each of the topics in order to consider how we could tailor policies to respond to the unique circumstances in Derry City and Strabane District Council whilst also taking account of the RDS and SPPS. These papers were crucial in identifying the needs of the rural area and how they could be better addressed by tailoring planning policies to reflect the unique circumstances of the rural area in Derry City and Strabane District Council.

The Ben Cave Health Impact Study Report, 2015 report and recommendations do not appear to have been considered despite the council commissioning this study and subsequently agreeing to implement the reports recommendations.

<http://meetings.derrycityandstrabandistrict.com/documents/s12119/Appendix%201%20health%20impact%20REPORT.pdf>