
From:
Sent: 29 September 2020 08:42
To: Local Development Plan
Subject: FW: LDP
Attachments: DAS UFU response to Local Development Plans (002).pdf

Follow Up Flag: Follow up
Flag Status: Completed

Dear colleague,

The following email below has been received through the Councils website and has been forwarded to you for your information or action.

Administrative Assistant

From:
Sent: 28 September 2020 17:12
To: info
Subject: LDP

Good Afternoon,

Please find attached response to the councils local development plans from the Ulster Farmers' Union.

Kind Regards,

Legislation and Rural Affairs Policy Officer

Ulster Farmers Union
475 Antrim Road
Belfast
BT15 3DA





UFU Headquarters
475 Antrim Road
BELFAST
BT15 3DA
www.ufuni.org

Derry and Strabane District Council
98 Strand Road
Derry
BT48 7NN

28th September 2020

Re: Local Development Plans

The Ulster Farmers' Union (UFU) is the largest farming organisation in Northern Ireland (NI) representing approximately 11,500 farming families. The UFU represents farmers from all areas of NI, across all sectors and has a vision of a productive, profitable and progressive farming sector.

The UFU represents a major component of the rural community in NI. Our members and associated family own or control a significant proportion of land in NI and play a vital role in the economy. Planning is a key issue for the UFU due to the huge impact it can have on its members, the sustainability of their businesses and on local rural communities.

We feel it is highly appropriate that we respond to this document and we trust that our comments will be taken into account when developing the final document.

I trust that these comments are of use to you, if you require any further information please do not hesitate to get in contact.

Yours Sincerely,

UFU Deputy President

UFU response to council local development plan consultations

I refer to the publication of your local development plan strategies and welcome the opportunity to comment on behalf of the UFU as a **key consultee**.

While we appreciate that this is a draft plan strategy and is the first, local development plan prepared by the Council, we would offer these comments:

Development Plan Practice Note 7 states, that the Plan Strategy should set out an ambitious but realistic vision for the council area, as well as the objectives and strategic policies required to deliver that vision (para 1.3). In the same paragraph it is said that the Plan should also ensure that its objectives are integrated with, add value to and assist in the delivery of National, Regional and local policies and strategies within Northern Ireland, the council area and other district councils. The plan strategy should identify interdependencies and relationships between places both within and across administrative boundaries. It should be both realistic and deliverable considering the resources available and the potential constraints which may arise during the plan period.

A Council must therefore have regard to relevant plans, policies and strategies not only in its own district, but also in the adjoining district areas. The Planning (Local Development Plan) Regulations (NI) 2015 identify each neighbouring council as a statutory consultation body. It is also acknowledged that the metropolitan area special working group was established to foster cooperation and the sharing of information, but there is little or no evidence of that in the local development plan strategy and how the relationship with neighbouring councils in terms of the proposed growth strategy is considered.

Consistency Test:

The UFU supports the emphasis on achieving sustainable development. In sustaining and supporting strong, sustainable growth there is a need for a coordinated approach to provide services, jobs and infrastructure and a focus on cooperation between service providers. Sustainable development should ensure that the needs of urban communities are not met at the expense of rural communities and family farms.

The UFU supports a coordinated approach to economic growth and the provision of strategic local employment and retail sites, historical monuments, recreation and tourism and heritage protection as well as housing needs.

The UFU can see little or no evidence of how a proposed growth strategy has been developed in relation to this plan.

The UFU has a degree of concern in relation to a wider spatial context where the evidence base for infrastructure and delivering such growth can be met. This includes physical infrastructure (such as roads, water and sewerage) and social/community infrastructure (such as schools and healthcare) as well as protecting our Countryside Heritage. The UFU request that Brownfield sites are prioritised over Greenfield sites when physical and social/community infrastructure is being considered.

The absence of a transport plan to accompany the planned strategy has clear implications for neighbouring councils as well as the farming community. The UFU supports the requirement for sustainable growth and less reliance on cars, which has clear impacts on the need for infrastructure and a proper infrastructure/transport plan. Park-and-Ride facilities, shared carparks both (public and private) and different modes of transport should be encouraged.

While accepting that the plan strategy has key elements looking at population growth and the support for resident population and Rural communities, the UFU supports a balanced growth of the economy, infrastructure and services. Again, the UFU would request an assurance that appropriate consideration is given to the transportation issues and the allocation of land for future development for all types of infrastructure, housing economic growth provides sustainability for the future of Northern Ireland.

The UFU would specifically make comment on the following areas:

Natural Heritage and Landscapes - protecting and enhancing natural heritage.

The UFU notes the carrying forward of the existing local development plan is natural heritage designations (AoHSV, LLPA, landscape wedges and SLNCI) and acknowledges that further work is planned and reviewing these existing designations the part of local policies plan. The UFU seeks clarification on the scope and purpose of this review. Will individual policies, site boundaries, new designations form part of this review? Farmers have been custodians of the countryside and landscape for many generations; therefore, councils should engage fully with farmers when reviewing designation with the purpose of protecting the landscape. Any new or reformed designations must deliver for the environment as well as those who work and reside in it.

Historic Environment and Archaeological Remains

The UFU notes the overall approach to protecting and enhancing the historical environment and the archaeological remains which sits in line with the RDS, SPPS and PPS 6.

The UFU notes that there is no reference in the strategic policy points of Areas of Significant Archaeological Interest.

Economic Development: economic development and settlement areas

The UFU notes the references to a further review of employment lands and would welcome the opportunity to discuss this further with regards to scope and the terms of the review. This could deliver a significant quantity of additional employment lands in and around the rural council area with the potential to positively impact the economic growth of rural areas. The review of employment and job creation in an area requires, landbanks for employment opportunities and inward investment, therefore the balance of growth must be measured and catered for.

Retail Development in the Countryside

The UFU notes that there are no size restrictions for the proposals in the countryside and that there is no policy direction for other types of retail development in the countryside, within the operational planning policy for town centres, retailing and other uses. Retail development in the countryside must be developed on a need's basis, regulated, and supported by suitable infrastructure.

Minerals and Mineral Development.

The UFU notes the balanced approach to mineral development, however it is unclear at this stage how it will affect the areas around lakes, loughs and Areas of High Scenic Value around council boundaries. Many of these areas are areas of out-standing natural beauty and high scenic value which require additional protection.

Currently areas of high scenic value and of interest have various controls in place to stop or control mineral extraction and development in a particular sensitive area. There needs to be controls which are

balanced and measured to protect agri-tourism businesses based on the attraction of AONB whereby rural businesses provide employment.

The UFU would support the protection of these specific areas as well as areas of mineral constraints which would protect workable mineral resources of economic and conservation value. The UFU agrees that a sustainable approach to minerals development in line with the SPPS will support local and regional supply chains and the overall economic growth of a council area. The UFU suggest that the local authority consider other opportunities to develop the economy on a balanced approach to deal with the employment needs of the area. It's important to provide the right solutions to meet the employment needs of an area.

Transportation, Strategic Greenways and Disused Transport Hubs.

The UFU welcomes the protection of these rights and would support the appropriate opportunities for the re-use with a presumption against development that would prejudice their use or future use for transport or recreational purposes.

With up to 1000km of greenways to be developed across NI, the UFU request that councils engage with local farmers from the early stages of proposing routes, throughout implementation and even when greenways are operational. Many local landowners and farmers have signed up to allow walkers to enjoy the NI landscape. However, livestock worrying, litter, fly-tipping, disease risks, safety issues and liability are all issues that farmers have concerns around when access to farmland is proposed.

Agriculture land is finite and a valuable resource to farmers which must be protected from unnecessary development where possible, to ensure the future viability and progression of the farm business. Access to the considerable area of publicly owned land in rural areas should be fully exploited before pursuing access onto private land, as much public land is underused. The UFU is supportive of agreed and organised access to private farmland if local landowners are in full agreement and landowners are indemnified against litigation. Far too often farmers are not properly compensated for the loss of their lands for roads development or other infrastructure that results in vesting of land.

The UFU also support the development of park and ride and park and share car park facilities to alleviate traffic congestion within rural, town and city Council areas. In addition the UFU encourage the council to see the value and be supportive of community transport hubs which can often meet the needs of local people better than regional public transport.

Housing - Housing in Settlements and New Greenfield Housing Sites

The UFU note the future potential of dwelling units which closely reflects the overall strategic housing allocation for NI but does not appear to allow for an urban capacity study or windfall potential for sustainable housing growth.

Leisure and Tourism

The UFU supports a balanced approach to the development of lands for Leisure and Tourism. The development of lands should be based on **need** to cater for the growth of towns, city and rural areas. Publicly owned land should be fully exploited for leisure and tourism needs before pursuing access onto private land as much of this public land is underused

The UFU supports the housing growth indicators guidelines, which have been produced as a guide for preparing development plans to achieve this distribution for sustainable growth. It is important that

neighbouring councils refer to each other in relation to the overall Northern Ireland single housing market.

The above representation correlates the views of the UFU according to the position set out in your draft plan strategy. The UFU you are very conscious and sensitive to the fact that this is a new process for us all and we would like to support the development of a comprehensive and robust plan that supports the farming and rural communities across all of NI.

This has also been supported by the wider DAERA departmental approach and all of the guidance in relation to the introduction of the new planning legislation.

The UFU would welcome the opportunity to be one of your key consultees in any part of the future development of the plan process to express the needs of the rural farming and community environment and to support any long-term plan which is developed in your Council area.