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From: DfE CLU Mailbox <clumailbox@economy-ni.gov.uk>
Sent: 27 January 2020 14:16
To: Local Development Plan
Cc: DfE Permanent Secretary Support; DfE CLU Mailbox
Subject: Derry City and Strabane LDP Draft Strategy Consultation - DfE Response
Attachments: Derry City and Strabane LDP Draft Plan Strategy consultation - DfE composite response.pdf

Good Morning,

Please see attached the Department for the Economy's composite response in relation to Derry City and Strabane District Council Local Development Plan, draft Plan Strategy.

Tourism NI has forwarded its response to the LDP team directly. However for the purpose of completeness, I have also included its response within the DfE composite return.

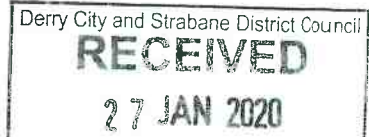
Invest NI has advised it is a statutory consultee and will respond directly to the Council.

Regards

Central Liaison Unit

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**DEPARTMENT FOR THE ECONOMY COMMENTS ON DERRY CITY AND STRABANE
DISTRICT COUNCIL LOCAL DEVELOPMENT PLAN - DRAFT PLAN STRATEGY**

TOURISM NI

- Tourism NI (TNI) welcomes the Publication of Derry City & Strabane District Council's (DCSDC) Local Development Plan 2032 - draft Plan Strategy and the opportunity to comment.
- Tourism NI is also represented on the DCSDC Community Planning Partnership as a statutory partner and works very closely with the Council's Tourism Department on a number of projects and initiatives.
- Tourism NI appointed a dedicated Regional Manager for the DCSDC area in 2016 and has since supported and part funded a Tourism Strategy 2018 - 25 for the DCSDC area, which is currently being implemented.
- The Local Development Plan 2032 – Draft Plan Strategy establishes:
 1. A clear aspiration to grow the visitor economy through a sustainable approach that will balance the needs of the visitor and tourism industry, with careful protection of the built and natural environment.
 2. That the Historic Environment is being recognised and valued since, for example, the Derry Walls, Ebrington and various heritage properties in the city and region play a major role in attracting visitors to the DCSDC area, especially from out of state markets
- Tourism NI is represented on the Derry Walls Management Group which is chaired and facilitated by Historic Environment Division (DfC) and which is responsible for the delivery of the Walls Management and Conservations Plans
- Tourism NI is content that the approach outlined seeks to achieve sustainable tourism growth coupled with the preservation of our built and natural assets. The approach is sensitive to the preservation of the natural environment while seeking to enable communities to prosper sustainably.
- Tourism NI encourages polices and initiatives that encourage balanced and sustainable growth of tourism facilities, services and tourism accommodation portfolios within the district councils existing city, towns and settlements.
- In November 2019, Tourism NI launched its new Experience Band, 'Northern Ireland - Embrace a Giant Spirit' and which features visitor experiences in the DCSDC area and Tourism NI will continue to work in partnership with DCSDC to develop further visitor experiences in the DCSDC area in the months and years ahead.

- TNI has recently provided approx. £0.5m of funding, in partnership with DCSDC, towards the relocation of the Visitor Information Centre (VIC) from Foyle St to Waterloo Place, which is much more convenient to the city's historic walls and other key attractions within and near to the Walled City. A construction team has been appointed and work is due to complete in May 2020 delivering a new dynamic and interactive VIC for the visitors of the city and region.
- Tourism NI is working closely with DCSDC on the tourism projects included in the City Deal to ensure that investment in tourism is aligned to key objectives in the draft NI Tourism Strategy – Tourism 2030, including the doubling of visitor spend to £2b by 2030. Key tourism projects include 'Secrets of the Historic Walled City', DNA – Derry Maritime Museum and a 'Beyond Walls' signature visitor experience.
- NISRA research figures indicate that there has been a steady growth in tourism spend in the DCSDC area of 20% since 2013, UK City of Culture year. In 2018, the DCSDC area represented 6% of all tourism spend in N. Ireland therefore this represents an opportunity for growth.
- In 2018, the DCSDC area had a hotel room occupancy of 68%, the 3rd highest of all council areas of NI and three new hotels have been developed in the area since 2016 – Bishop's Gate Hotel, Shipquay Hotel and Holiday Inn Express. In addition, it is encouraging to hear that there is a further number of planned hotel developments in the pipeline.
- In relation to comments of a more technical nature, could I suggest that the following wording is used when listing type of tourist accommodation on PP.190-192 and wherever they appear elsewhere in the draft Plan Strategy, to replace with : -

Hotel, Guest House, Bed & Breakfast, Guest Accommodation (e.g. a restaurant with rooms, or a motel) Tourist Hostel, Bunk-House (a rural hostel; very basic) or Campus Accommodation

- On P.190, in the para immediately under TOU 4 Hotels, could I suggest the inclusion of the below wording stressing the need for operators of all types of tourist accommodation (as listed) to receive certification from Tourism NI before they begin trading, and which should be included elsewhere in the draft Plan Strategy where felt appropriate – visit link for more info - <https://tourismni.com/startup-advice/> : -

Under the [Tourism \(Northern Ireland\) Order 1992](#), it stipulates that all tourist accommodation providers must receive certification from Tourism NI before they are allowed to begin operating.

TOURISM POLICY AND LIAISON BRANCH

The Department welcomes the opportunity to comment on the Publication of Derry City & Strabane District Council's Local Development Plan 2032 – draft Plan Strategy. The

Department recognises that the draft Plan Strategy seeks to balance sustainable, high quality tourism growth that protects the built, natural and historic environment, while supporting development of the local tourism economy. This approach is complementary to the strategic drive in respect to tourism in Northern Ireland and will form a key aspect to our overarching NI Tourism Strategy, going forward. The Department is aware of the detailed comments which have been provided separately by Tourism NI and is supportive of the comments, and hopes that you will find them useful.

DFE MINERALS AND PETROLEUM AND GEOLOGICAL SURVEY NI

The Department for the Economy is responsible for a number of key Programme for Government objectives including ensuring that we build a strong and competitive, regionally balanced economy where we have more people in better jobs whilst ensuring that we live and work sustainably. It is within this context that the Department's Minerals and Petroleum Branch and the Geological Survey of Northern Ireland (MAPB and GSNI) make the following response.

MAPB/GSNI colleagues would welcome an opportunity to meet with the Council to discuss any issues that may arise from our response or offer any help that you may require. To arrange, please contact Lorraine Fleming Lorraine.Fleming@economy-ni.gov.uk.

MAPB/GSNI welcomes the opportunity to engage with Council in the preparation of the Derry City and Strabane District Council Local Development Plan (LDP) 2030 and would make the following comments:

Minerals & Overall Strategic Objectives of the DPS

MAPB welcomes the economic development objective (v): to manage the utilisation of the District's mineral resources in a responsible and sustainable manner that meets the development needs of the district and wider region, yet protecting the landscape quality and natural environment of the district.

It is noted that in your Overall Strategy to deliver Growth levels in Chapter 5 you include expanding economic development and employment, including minerals, across the district. This is an important recognition of the need for minerals to achieve the level of infrastructural, office accommodation and housing growth proposed.

The Department welcome's the 'Zero Waste- Circular Economy' approach in social objective (vii): Waste – to minimise our waste products and to sustainably provide facilities to manage/reuse any such products in a sustainable manner.

Chapter 13 - Mineral Development

The matter of mineral development requires a carefully balanced approach to maximise the potential economic benefits while ensuring adequate protection for the environment and local community. The Council's recognition of the rich mineral potential within the Plan area and the opportunities that this provides is welcomed, as is the commitment to

identify minerals reserve areas. The Department welcome's the fact that Council has taken account of many of our previous comments on the draft policies on minerals.

The Council's focus on sustainability in relation to mineral development is welcomed given the complexity of issue surrounding minerals development and the importance of ensuring proper protections are in place. However, there is potential that climate change targets such as net zero will increase the demand for valuable minerals and as minerals, particularly valuable minerals can only be developed where they are found care should be taken in the designation of areas of constraint as the assessment in relation to sustainability may be influenced by these more global factors in the future. Therefore, the Council's proposal at 13.7 to consider boundaries for areas of constraint or mineral reserve areas on a case by case basis through the Local Plan policies is welcomed. The approach of considering mineral development proposals outside ACMD and MRA on their individual merits is welcomed.

In relation to 13:18 and 13:19 due consideration for the issues associated with underground mining is welcomed. In addition to the potential problems identified, surface sterilization of resources is a potential issue where underground working is not taken into consideration when assessing surface development proposals.

In 13:25 the assessment of proposed workings within an Area of Constraint on Mineral Development on a case-by-case basis is welcomed, as is the proposal to take nature and scale of mineral working into account to determine how long 'short-term' might be. At this point it may also be useful to clarify that minerals exploration is not minerals development and that the techniques used in the exploration for minerals are significantly less likely to have any detrimental effect on the environment.

In 13.36 the recognition that end of life mineral sites can be used to provide opportunities for enhanced biodiversity is welcomed. End of life planning should form part of any mineral development application to ensure net positive gain.

Renewable and Low Carbon Energy Development

DFE (GSNI) welcomes the commitment of Derry & Strabane District Council to facilitate the integration of renewable and low carbon energy technology into the design, siting and layout of new development.

Much of the renewable energy chapter is concerned with the future deployment of wind turbines, however, it should be noted that geothermal energy – from both shallow and deep sources – could play an important role in the decarbonisation of heat.

In urban settings, heat networks can be deployed, and in rural settings ground source heat pumps (GSHPs) have the potential to provide stable, secure low carbon heating and cooling. Shallow geothermal GSHP systems also have capacity to meet both heating and cooling needs. In GB and Europe the role of GSHPs has been recognised as one of a range of technologies that will be required to help us meet greenhouse gas emission targets. There is less potential within the Derry & Strabane District Council area for the

development of deep geothermal energy resources, using currently available technology, because of the nature of the local geology.

Land Stability

The Draft Plan Strategy outlines in policy CD1 and FLD1 the approach that development will not normally be permitted in areas of the coast and fluvial flood plains that are known to be at risk from flooding, coastal erosion or land instability. GSNI agree that development should not normally be permitted in these areas unless the applicant has demonstrated to the Council that there are no consequential risks to health and safety through a detailed investigation. It should be noted that areas of land instability are not restricted to fluvial plains and coastal areas. Inland areas may also present a risk of instability, particularly those on steep slopes and compressible ground. The Draft Plan Strategy should apply the same approach to development in all areas at risk of instability within the entire District Council area. This approach is in line with regional strategic objectives which advise that development will not be permitted in areas of land instability.

The Draft Plan Strategy states that localised areas that are known to be at risk from flooding, coastal erosion or land stability will be identified in the Local Policies Plan. The Council should be aware that there is limited information currently available to delineate areas at risk from coastal erosion and land instability. The Draft Plan Strategy should incorporate an approach which outlines that, as and when this information becomes available, the Local Policies Plan will be updated.

Energy Division

Gas

- Firmus Energy has installed extensive natural gas networks in Derry City in particular, and will continue to expand gas provision in their licence area where suitable gas loads exist.
- Natural gas has been available in the Strabane area since early 2017 by SGN Natural Gas, as part of the Gas to the West project, which is being grant supported by the NI Executive.
- Natural gas supports actions to reduce harmful emissions, and the decarbonisation of energy provision, as energy consumers' transition from use of oil for heating and business use.

Sustainables

Issues to be welcomed

- The commitment to the use of sustainable energy as a means of generating income, attracting investment and providing low carbon, affordable energy to the local population through economic development objective (b) (iv);

- The presumption for Green Belt development in relation to renewables (subject to the policies set out in Chapter 24) under Designation GB 1;
- The move towards making development proposals demonstrate how they are promoting the use of decentralised renewable energy systems under GDP2 and maximise opportunities for the use of sustainable construction techniques such as renewable energy generation under GDP8;
- The commitment that planning permission will be granted where renewable and low carbon energy technology has been incorporated (albeit with caveats) under GDPOL1;
- The provision of an opportunity for developers to pilot a 'resilient settlement' to include buildings that deploy renewable energy;
- The wish of the Council to facilitate and encourage greater integration of renewable and low carbon energy technologies (para 7.111); and the commitment to a smart grid pilot project (para 24.5).

All of these would encourage the Department that further renewable electricity generating techniques would be welcome in the Council area which is helpful as we consider what the ambition of any new renewables generation target should be going forward..

However, there are a few areas of concern in that regard including:

Issues of concern

- Introduction of Wind Energy Capacity Areas (WECA) "where it is considered that such landscapes have reached or are extremely close to their capacity and any further wind energy development within them, including re-powering, will need to be very carefully considered so that they do not unacceptably intensify existing adverse landscape impacts in these areas". We would ask how the measure of 'capacity' is defined i.e. is it the ability of the landscape to accommodate further development or the propensity of the local population to tolerate further development. Also, is there a prescribed measure of what 'unacceptably intensify' might mean in practice?
- Wind farm developments requiring a separation distance of 10 times the rotor diameter from an occupied property, with a minimum separation distance of 500m (RED1). This does not recognise technological development and will hamper re-use, refurbishment or repowering of sites where proposals are to use taller, more efficient turbines.

Data upgrades/factual inaccuracies

- At para 24.14 it is stated that "For the 12 month period January 2018 to December 2018, 83.1% of renewable electricity generation within NI was generated by wind, whilst biomass, biogas and solar PV continue to show a steady increase over the past few years". It would be worth noting that statistics recently released by the Department

show that for the period 1 October 2018 to 30 September 2019, 85.2% of the renewable electricity generated in Northern Ireland was generated from wind.

<https://www.economy-ni.gov.uk/sites/default/files/publications/economy/Issue-13-Electricity-Consumption-and-Renewable-Generation-in-Northern-Ireland-October-2018-to-September-2019.pdf>