
From:
Sent: 06 November 2020 16:25
To: Local Development Plan
Cc:
Subject: Consultation on LDP draft plan Strategy
Attachments: Local Development Plan formCOM RM6-11-20.docx; Additional sheets RM.docx

Follow Up Flag: Follow up
Flag Status: Completed

Dear Plan Team,

I downloaded a copy of the consultation form and had it converted to a Words format that I have tried to complete and attach the same together with additional comments. In doing so I have tried to point out that the form completion requires the competencies of a professional Planner to respond to in the manner required? I trust this will not result in my submission being rejected? My main comments are that the Plan does not adequately deal with Climate Change or seek to incorporate new technologies with regard to renewable energy and aggregate for the construction of homes and infrastructure is depleting finite glacial deposits of sand and gravel.

There is no consideration as to where the aggregate for building 10,000 new homes will come from nor the water supply for the some 30,000 inhabitants. It is perceived that reliance on cheap sand and gravel will continue from the finite glacial deposits of the Foyle river basin. Likewise water will be taken from the river Faughan until it is sucked dry to the detriment of the SSI etc. Also the sewerage treatment capacity is at it's limit. Will raw sewerage be released into the prized water bodies? Can Sewerage be treated and the waste water recycled and made potable? otherwise bore holes are required in the Skeoge Basin to save the Faughan. Sewerage sludge can be utilised as feedstock along with other bio waste to generate biogas. There is a great opportunity to set up the Skeoge development as far as possible as a self sustaining satellite town. Many of the proposals are not sustainable and require updating since being based on the 2011 plan prepared 30 years ago, much has change since.

It would be appreciated that you acknowledge receipt of this Representation in terms of the deadline of today and that it will be included in the Independent Examination?

yours sincerely

16/11/20 4:25 PM

Section B: Your Details

Q1. Are you responding as an individual, as an organisation or as an agent acting on behalf of individual, group or organisation? (Required)

Please only tick one

- Individual (Please fill in Question 2, then proceed to Section C)
- Organisation (Please fill in the remaining questions in the section, then proceed to Section D.)
- Agent (Please fill in the remaining questions in the section, then proceed to Section E.)

Q2. What is your name?

Title

First Name (Required)

Last Name (Required)

Email

Q3. Did you respond to the previous LDP Preferred Options Paper?

- Yes
- No
- Unsure

Q4. Tick whichever is applicable:

- I /we wish to carry forward my previously submitted representation without adding anything further (Insert Rep Number if known)
- I / we do wish to provide additional / revised information to my / our previously submitted Representation (insert Rep Number if known)
- I / we did not submit a representation during the previous consultation period (December 2019 – January 2020) and now wish to submit a Representation during this Re-Consultation period.

Section C: Individuals

Address (Required)

Town (Required)

Post code (Required)

On completion, please proceed to Section F.

Section D: Organisation

If you have selected that you are responding as an organisation, there are a number of details that we are legally required to obtain from you. If you are responding on behalf of a group or organisation, please complete this section, then proceed to Section F.

Organisation / Group Name (Required) I am a member of several local community groups that are concerned with conservation due to the COVID pandemic we have been unable to meet to prepare a concerted response! Eg Foyle civic trust, Fayughan anglers ltd and community groups in Strathfoyle Maydownas such I have participated in the workshops for the Faughan DEA plan. BUT this Skeoge Development potentially impacts on much of the Faughan catchment etc.

Your Job Title / Position (Required)

Organisation / Group Address (if different from above)

Address (Required)

Town (Required)

Postcode (Required)

On completion, please proceed to Section F

Section E: Agents

If you have selected that you are responding on behalf of another individual, organisation or group there are a number of details that we are legally required to obtain from you. Please provide details of the individual, organisation or group that you are representing.

Client Contact Details

Title / First Name (Required)

Last Name (Required)

Organisation / Group Address (if different from above)

Address (Required)

Town (Required)

Postcode (Required)

Email address (Required)

On completion, please proceed to Section F

Agent Contact Details

Title / First Name (Required)

Last Name (Required)

Organisation / Group Address (if different from above)

Address (Required)

Town (Required)

Postcode (Required)

Email address (Required)

On completion, please proceed to Section F

Q4. Would you like us to contact you, your client or both in relation to this response or future consultations on the LDP? Please only select one

Agent

Client

Both

Section F: Soundness

The LDP draft Plan Strategy will be examined at Independent Examination (IE) in regard to its 'soundness'. Accordingly, your responses should be based on soundness and directed at specific strategic policies or proposals that you consider to be unsound, along with your reasons. The tests of soundness are set out below in Section J.

Those wishing to make representations seeking to change the draft Plan Strategy should clearly state why they consider the document to be unsound having regard to the soundness tests in Section J. It is very important that when you are submitting your representation that your response reflects the most appropriate soundness test(s) which you believe the draft Plan Strategy fails to meet. There will be no further opportunity to submit information once the consultation period has closed unless the Independent Examiner requests it.

Those who make a representation seeking to change the LDP draft Plan Strategy should also state below whether they wish to be heard orally at the Independent Examination (Please see www.pacni.gov.uk for further details on the IE procedures.)

Section G: Type of Procedure

Q5. Please indicate if you would like your representation to be dealt with by: (Required)

Please select one item only

- Written (Choose this procedure to have your representation considered in written form only)
 Oral Hearing (Choose this procedure to present your representation orally at the public hearing)

Unless you specifically request a hearing, the Independent Examiner will proceed on the basis that you are content to have your representation considered in written form only.

Please note that the Independent Examiner will be expected to give the same careful consideration to written representations as to those representations dealt with by oral hearing.

Section H: Is the draft Plan Strategy Sound?

Your comments should be set out in full. This will assist the Independent Examiner to understand the issues you raise. You will only be able to submit further additional information if the Independent Examiner invites you to do so.

Sound

If you consider the Plan Strategy to be Sound and wish to support the LDP Plan Strategy, please set out your comments below.

Overall the strategy is sound in that the changing social and demographics are considered and more housing is required the construction of some 10,000 new house with infrastructure have not considered the adverse environmental impacts of this. The easy sustainable remedies are set out with tree planting of open spaces ,retention of hedge rows and trees are included. But this ignores the impacts of gravel extraction and water abstraction within the

Foyle River Basin to meet this need. Air quality is poor but coal is imported and widely used along with firewood. Provision for solar panels on roofs should be included in the layout of housing estates orientated to face south west into the sun. likewise wind energy as part of the mix. It is recognised that burning coal is often the only affordable source of heating by the poorer section of the community. But they are inadvertently impacted with breathing difficulties from the poor air quality/winter smogs.

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

Section I: Unsound

In this section, we will be asking you to specify which part(s) of the draft Plan Strategy you consider to be unsound.

Note: If you wish to inform us that more than one part of the draft Plan Strategy is unsound each part should be listed separately, and Sections J and K filled out for each separate part of the draft Plan Strategy. (i.e. if you believe that multiple parts of the draft Plan Strategy are unsound, please fill out multiple copies of Sections J & K.).

Q6. If you consider that the LDP draft Plan Strategy is unsound and does not meet one or more of the tests of soundness below, you must indicate which test(s) you consider it does not meet, having regard to Development Plan Practice Note 6 available at:

https://www.planningni.gov.uk/index/news/dfi_planning_news/news_releases_2015_onwards/development_plan_practice_note_06_soundness_version_2_may_2017_.pdf

Please note that if you do not identify a test(s), your comments may not be considered by the Independent Examiner. Continued on next page.

Section J: Tests of Soundness (Required)

State which Chapter / Policy / Paragraph / Map that this Section refers to:

This document is bewildering to the layman and requires someone with a full understanding of the Planning processes to respond adequately. Developers are well funded and can engage professional agents to state their case. In this situation I would conclude it is unfair and unequal for all interested in Planning matters to voice their concerns. The procedural Test section below is a case in point. Likewise for sections P and C. A layman is unlikely to have the competencies required as indeed the planning inspectorate will have. This document appears to be designed to frustrate and discourage comment adverse or otherwise? I have attempted to question some of the approaches promoted in the strategy document.

This should relate to only one section, paragraph or policy of the LDP draft Plan Strategy. If you wish to inform us that you consider more than one part of the LDP draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

Procedural tests

- P1. Has the plan been prepared in accordance with the Council's timetable and the Statement of Community Involvement?**
- P2. Has the Council prepared its Preferred Options Paper and taken into account any representations made?**
- P3. Has the plan been subject to Sustainability Appraisal including Strategic Environmental Assessment?**
- P4. Did the Council comply with the regulations on the form and content of its plan and on the procedure for preparing the plan?**

Consistency tests

- C1. Did the Council take account of the Regional Development Strategy?**
- C2. Did the Council take account of its Community Plan?**
- C3. Did the Council take account of policy and guidance issued by the Department**

Coherence and effectiveness tests

- CE1. The plan sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant, is it in conflict with the plans of neighbouring Councils.**
- CE2. The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base.**
- CE3. There are clear mechanisms for implementation and monitoring.**
- CE4. The plan is reasonably flexible to enable it to deal with changing circumstances.**

Section K: Which part(s) of the draft Plan Strategy are you commenting on?

This should relate to only one section, paragraph or policy of the LDP draft Plan Strategy. If you wish to inform us that you consider more than one part of the LDP draft Plan Strategy is unsound, you can submit further representations by completing and submitting additional copies of this section.

Relevant Chapter number(s) 2,4as set out in the additional sheets the strategy is considered unsound from two main aspects the environmental damage caused by the extraction of sand and gravel for the construction of 10,000 new houses and the over exploitation of water resources without considering recycling water.

(and/ or) **Relevant Policy number(s)** as

(and/or) **Relevant Paragraph number(s)**

(and/or) **District Proposals Map**

Please give full details of why you consider this part of the LDP draft Plan Strategy to be unsound, having regard to the tests(s) you have identified above. Please be as clear and concise as possible.

The plan Strategy is based on the 2011 plan that was prepared about 30 years ago much has changed since in terms of technology, building insulation, availability of renewable energy but this isn't mentioned in the new document. Development of infrastructure and housing is based on finite glacial sand and gravel resources the exploitation of which must be curtailed and substitutes used Likewise water is regarded as a free goods and isn't conserved by recycling

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

If you consider the LDP draft Plan Strategy to be unsound, please provide details of what changes(s) you consider necessary to make the LDP draft Plan Strategy sound.

see Additional sheets

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

Section L: Sustainability Appraisal

If you wish to submit an 'expression of opinion' in relation to the Sustainability Appraisal (SA) of the LDP draft Plan Strategy (incorporating the Strategic Environmental Assessment (SEA)) please state them below or by email to LDP@DerryStrabane.com. If sending by email, please clearly state that your comments are in relation to the SA.

Again a professional required

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

Section M: Draft Habitats Regulation Assessment (HRA or AA)

If you have any comments or opinions in relation to the Draft Habitats Regulation Assessment (HRA) report of the LDP draft Plan Strategy, please submit them below or by email to LDP@DerryStrabane.com. If sending by email, please clearly state that your comments are in relation to the HRA.

SEE I have failed to find a section or reference to the habitats regulation but my comments reflect concern for the conservation and protection of habitats especially for the river catchments and the sand and gravel extraction from them aslo water consumption.

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

Section N: Draft Equality Impact Assessment (EQIA)

If you have any comments or opinions in relation to the Draft Equality Impact Assessment (EQIA) report of the LDP draft Plan Strategy, please submit them below or by email to LDP@DerryStrabane.com. If sending by email, please clearly state that your comments are in relation to the EQIA.

Again I consider this form assumes everyone is a qualified professional planner to respond coherently to the Questions asked.

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

Section O: Draft Rural Needs Impact Assessment (RNIA)

If you have any comments or opinions in relation to the Draft Rural Needs Impact Assessment (RNIA) report of the LDP draft Plan Strategy, please submit them below or by email to LDP@DerryStrabane.com. If sending by email, please clearly state that your comments are in relation to the RNIA.

More involvement with the farming community is required to conserve landscape features that are a cultural assets: like hedge rows created during the great hunger mid nineteenth century. The glacial deposits, provide/ lead to increased ground-water storage. When the total available ground-water storage is exceeded, ground-water flooding occurs. Other conditions that may also contribute to ground-water flooding are based on changes in land use. The conversion of undeveloped arable areas into developed commercial and residential areas should be curtailed. The glacial deposits that cover most of the plan area are scientific assets . In that:

Scientifically, glaciofluvial deposits provide critical information on the nature, pattern and characteristics of ice wastage at the end of the last ice age. The different depositional settings and range of palaeoenvironments inferred from the sedimentological and geomorphic data provide evidence for inferences on the mechanisms and controls of ice-sheet decay. Without this information we are unlikely to understand how our landscape was formed or the possible climatic changes which occurred.

Here is Some wisdom found during IT research on landuse in similar locations:

Land Use Change to Urban Housing Estates

The Loss of productive agricultural soils, whilst of note and potentially of local importance, is unlikely to be of high significance in the context of the plan area given the quality/quantity of the soil. In addition, if quarries or gravel pit sites are properly reinstated they could retain some agricultural value. When development takes place, the ground which it is built on is effectively sealed and natural processes can no longer take place. Even if the development is later demolished and the ground reinstated it can still take time to re-establish itself. Therefore

the soil type upon which development is to take place and the land take of the development should be considered, and where possible developments should only take place on Brownfield sites. Compaction of soils, through earth moving works and increased mechanical activity over the ground, can result in a decrease in infiltration, a reduction in water and gas storage and decreased plant productivity, which can cause issues including increased runoff, which can lead to erosion and flooding. The environmental functions of the soil cover are destroyed. When the soil is heaped up and eventually respread on open spaces, the soil flora and fauna have been eliminated. The window dressing of tree planting takes place on a severely degraded compacted land with impeded drainage where the restoration process will take generations to recover to what it once was.

Contamination.

Contaminations of superficial soils can impact on human health, soil flora and fauna, potentially making land unfit for purpose and affecting biodiversity. In turn contamination of soils can result in chemicals leaching into watercourses, damaging water quality and potentially affecting biodiversity. Part IIA of the Environmental Protection Act 1990 (EPA) ('Part IIA'), which came into force in July 2000, provides the legislative framework for the identification and remediation of contaminated land. Did this occur on the FORT George site? An historical industrial site with potential for contamination risk.

Climate Change

Climate change will be one of the main pressures on soils and geology in the plan Area over the coming years. As our climate becomes more hostile, flood events are expected to become more severe and frequent. RE August 2017. Such events have the ability to wash out river channels and undermine slopes, increasing the risk of landslides. It is important to ensure proper Sustainable Urban Drainage Systems (SUDS) provision for new developments are implemented along with management to limit surface water runoff in the event of flood events, with the aim of maintaining or improving the Greenfield runoff rate, preventing the developments becoming detrimental to the geodiversity. It is also important to consider the need for flood defence measures to limit damage from fluvial flooding of the Skeoge lowlands. The harvesting, capture, storage and treatment of such runoff for potable consumption is necessary. There is potential for other impacts of climate change in the plan area (e.g. changes to air quality/heatwaves) and these will also be important in planning considerations. The need to move to a low carbon future will also shape decisions regarding the energy mix in N. Ireland, including any consideration of unconventional oil and gas exploration (Fracking). Ensuring legislation is in place for the protection of soils is one measure through which regulators can ensure we can attempt to reduce and mitigate against the effects of climate change. Soils act as a natural store and filter for rainfall and ensuring degradation of soils is limited, and improving soils where possible, means their ability to limit surface water runoff and help filter chemicals can aid in reducing flooding, which in turn can further damage soils and cause erosion and outwash. Earth worms that once maintained soil water drainage channels have been eliminated by the invasive New Zealand Flat worm. The drainage on housing development sites is impaired further by the use of heavy earth moving equipment usually during wet soil conditions when the earth becomes puddled and fine particles further block soil air spaces and drainage spaces. Additional sheets are attached.

Attach additional sheet(s) if necessary, but please be as clear and concise as possible.

Additional sheets

The points that have not been considered are:

Biodiversity strategy Vision for N. Ireland 2011-2050

The six targets covered by the EU Strategy focus on –

- the full implementation of EU legislation;
- better protection and restoration of ecosystems and the services they provide, and greater use of green infrastructure;
- more sustainable agriculture and forestry;
- better management of EU fish stocks and more sustainable fisheries
- tighter controls on invasive alien species; and
- a greater EU contribution to averting global biodiversity loss.

The unsustainable extraction of the finite glacial sand and gravel deposits of the Foyle basin particularly those of the Faughan, Dennet and Roe rivers for aggregate in the construction industry that is loosely controlled(Mabuoy Gorticross) these deposits protect and sustain the riverine habitats that are SSI and require active protection as required in the Habitats and Water Directives. The water stored in these deposits maintain stream flow in dry periods and ameliorate flood water peaks this is especially so with Climate change where extreme events are more likely to occur.

Aggregate should be source from the stone quarries several of which occur in the area improved road infrastructure should make transportation easier? Less of the agricultural landscape is taken and the stripping of the topsoil overburden is less without damaging woodland and biodiversity like some current unplanned operations in Bonds Glen.pAge8 we are building more houses.WE are investing in Parks,Play areas and leisure facilities right across our city and district

Page 6 THIs is Our Place Stunning landscape being demolished strong competitor in Global Tourism??

Sustainable water supplies

The 10,000 new homes require potable water that is currently extracted from the Faughan at Cloghole this is at the safe limit where further abstraction threatens the ecology of the transitional water zone below the dam where the young salmon smolts adapt from fresh water to salt before setting off on their journey to the NE Atlantic where they grow and return some 14 months later as grilse that undertake a reverse process and adapt to a fresh water environment. They home in on the water characteristics of their specific nurse stream. Since the fresh water source is limited further consumption needs to be sourced from recycled waste water and stored storm water flow from hard surfaces.

The planet matters: page 22” we understand we are ultimately dependent on the natural world as a support system and we need to live sustainably to Produce and consume within planetary boundaries. We need to promote renewable energies and connect with our rich waterways and greenways” .???

Climate change and New Technology

In January 1993 the Department announced that it was commencing the preparation of a new Development Plan for the Derry City Council Area. After consultation with the City Council, a Notice of Intention to prepare the Plan was published.

Since the 2011 plan was formulated and adopted some 20 years ago rapid changes have occurred. Renewable energy can be generated from solar panels and wind farms. The design and layout of new housing estates should be such that roofs are orientated to harvest /catch the solar radiation. Electricity cell storage should be considered for supplementary heating. Budget neutral energy homes are required with widespread use of insulation techniques. Refer, again to chapt3 page 26 Sustainability. Where are the raw materials for housing sourced from more wood is needed in the construction of these? Residual waste goes where?

AIR quality Page 16 Co2 emissions are 7.1 tons per capita

Air quality in Derry is poor due in part to burning fossil fuel s but is largely from traffic emissions!

The actual consumption of coal and wood is difficult to locate/quantify but it is a thriving business for some 200years and is part of the culture:” Nothing like A wee coal fire”:this culture is perpetuated by:

Welcome to Coal Merchants in Derry. You can find details of services, products, contact details, opening hours and address details for Coal Merchants businesses in Derry and surrounding areas. You can also view and leave reviews for businesses based on your experience. If you have a Coal Merchants business and want to see your business listed on our website, please contact us to add your listing and get more exposure to local potential customers.

Fuel Preparations International is a washing and screening processing facility which opened in 1991 in the Port of Londonderry, Northern Ireland.

The facility is in operation 24 hours per day, 7 days per week. The facility is approximately 12 acres and handles all types of solid fuels including Coal, Met coke, Pet coke and Anthracite. The raw materials are imported by sea and exported from the weighbridge facility by road or again by sea-freight.

Domestic coal is also processed and bagged by a state-of-the-art automated bagging system which is then loaded onto trucks and delivered all over Ireland and the UK. Other bulk materials can also be handled and stored in either open or covered storage depending on customer requirements and onward transport by either road or sea can be easily arranged. Presumably no other port in these islands would accommodate this commerce which is detrimental to:

Clean Air Strategies:

The Clean Air Strategy, published in January 2019 by the UK Department for Environment, Food and Rural Affairs (Defra), sets out a number of objectives to improve air quality across the UK. Section 9.5 of the Clean Air Strategy covers air pollution in Northern Ireland. Additionally, DAERA has been working on developing a draft Clean Air Strategy for Northern Ireland Discussion Document. This work has involved close collaboration with other departments. The

Other shortcomings:

Chap 3 page 24 :partners do not mention the Loughs agency? Waterwayamd fisheries, tourism

Page26 circular economy Support required for grass root enterprises use and repair discarde items recycling.Protection of local ecosystems Top soil the farming community are rarely mentioned in the documentation yet they control most of the land resource andpractice unsustainable practices with regard to he topsoil Woodland management si required to promote regeneration.

Chap 4 page30 Environmental well being there are many bland statements in the document how is the strategy implemented as action plans DEA's?? should be stated as such funding required too much reliance on the Voluntary Sector.

Page 34 Outcomes and actions there is much emphasis on sustainability and care of the natural heritage yet education and training in the educational institutes is lacking environmental managemnt and training is required To protect manage and conserve natural resources, landscapes and associated biodiversity.and the restoration of begrade landscapes. JOB creation.

Page 36-44 Heritage assets and tourist attractions these require protection promotion and publicity eg River Foyle

Outcomes and actions we live sustainably : clean air smokeless zones no coal, enhancement of our natural enviromnt (FLY tipping,and littering education required) recycle wate water. Magee university to have environmental education linked to health and wellbeing healthy people healthy landscapes?? Enhance the inventory of heritage assets in the Plan area.

RISks and constraints. The sewerage system lack of capacity is a major constraint to processing sewage and recycling waste water.raw sewage into our prizes water bodies is amajor threat. Like wise intensive farming with slurry spreading threatens soil biodiversityand much of the birdlife. The present COVID pandemic was unforeseen but the threat of climate change is well sign posted?what if the airport is flooded by a storm surge or the railway line washed out? Should the plan have an emergency disater plan in its strategy A firee at an industrial estate or recycling plant? oil spills etc?

More involvemnt with the farming community is required to conserve landscape features that are a cultural assets: like hedge rows created during the great hunger mid nineteenth century. The glacial deposits,provide/ lead to increased ground-water storage. When the total available ground-water storage is exceeded, ground-water flooding occurs. Other conditions that may also contribute to ground-water flooding are based on changes in land use. The conversion of undeveloped arable areas into developed commercial and residential areas should becurtailed. The glacial deposits that cover most of the plan area are scientific assets . In that:

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Here is Some wisdom found during IT research on land use in similar locations my own practical experience in landscape management supports this:

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