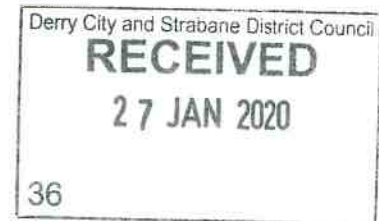


**Chloe Duddy**

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**From:** Paul Hughes [REDACTED]  
**Sent:** 27 January 2020 10:58  
**To:** Local Development Plan  
**Subject:** Fwd:



Please acknowledge receipt of this correspondence.

Kind Regards,

Paul Hughes

FAO: Independent Examiner (Derry City & Strabane District) Draft Local Development Plan

I am submitting this representation in response to Councils Draft LDP consultation. My concerns relate to: Chapter 20 'Waste Planning' (Pages 309-321); and I consider much of this chapter to be 'unsound' for reasons that I will outline below.

Page 309  
Paragraph 20.1

"The council recognises that managing our waste sustainably is essential for the health and well-being of society and our quality of life. Waste can be considered as a resource, with potential for energy generation and/or employment creation."

In submitting this representation I would like to inform the independent examiner that the people and council of Derry City & Strabane District have rejected gasification/incineration as a waste management option. The most recent attempt to build a gasification plant in 2015 at Maydown was defeated by a mass people powered campaign. Over 10,000 people signed a petition at the time and the rejection of 'gasification' by so many people right across the city was unanimous. Born out of this people powered campaign victory was Zero Waste North West; a local environmental campaigning group that has since worked positively with Derry City and Strabane District Council in developing a Zero Waste and Circular Economy vision and strategy for the city and district that does not include gasification or incineration as a waste management technology. Furthermore since this time the council have funded and commissioned a Health Impact Study for the Strathfoyle/Lisahally/Maydown/Culmore areas and we would ask that the LDP give full considerations to this report and subsequent recommendations. (Ben Cave Associates 2015) Its important that full consideration is giving to this report as it looked at the 'culmative impact' for local residents already residing beside an area with a high concentration of industrialisation. It is also my understanding that the corporate position of Derry City and Strabane District Council is to oppose 'Gasification & Incineration'.

Page 309  
Paragraph 20.3

"The LDP assesses the likely event of future waste management facilities for this District taking account of The Northern Ireland Waste Management Strategy (NIWMS) (2013) - "Delivering Resource Efficiency". Furthermore, the council is a member of The North West Region Waste Management Group (NWGWGMG), along with Causeway Coast & Glens Borough Council. This group has produced a Waste Management Plan (WMP), which sets out the waste management arrangements for the council areas from 2016-2020."

Is it correct that this document will be out of date (expires) at some point during 2020. This document continues to reference 'gasification' as a waste management technology under consideration by this council. There have been many council motions in recent years affirming that the corporate position of Derry City & Strabane District Council is to reject and oppose 'gasification or incineration' as a form of waste management technologies here. These technologies have also been firmly rejected by the vast majority of citizens within this city and district and will continue to be rejected. I would like the LDP to clarify councils corporate position in relation to Gasification/Incineration and for the text of such carried motions to be referenced within the final LDP. This would help make the LDP sound.

Page 309  
Paragraph 20.4

"The move towards sustainable waste management means that more facilities will be required to sort, recycle, process and recover energy from waste in the future as we move away from our reliance on landfill and work towards the achievement of the landfill diversion targets."

I would suggest that the LDP makes specific reference to the Ben Cave 2015 Health Impact Study and its recommendations. This would help make the LDP sound.

Within our local communities of Strathfoyle/Lisahally and Maydown (Faughan DEA) we already have:

- A local household recycling centre (Derry City & Strabane District Council)
- A private waste sorting / processing centre (RiverRidge Recycling)
- A private bio mass power station (Evermore Energy)

I would ask that the LDP take into account and note the already 'over industrialisation' of Strathfoyle and Maydown and our areas current contributions to waste management within the city and district, we feel strongly that any future development proposals planed for within the existing industrial zone at Lisahally/Maydown must give full consideration (and reference) to the (Ben Cave Health Impact Study 2015) and as local youth and community groups we reserve the right to continue to remind planners and decision makers of the recommendations contained within the report. As local residents, we also reserve the right to object to any future plans for gasification in the area in line with council policy and the already expressed wishes of citizens from right across the city and district.

Paragraph 20.8

"There are currently no landfill sites, a number of public and private waste processing facilities and 11 recycling centres within the District. During the LDP period, it is expected that further public and private facilities will be developed across the district, including new household recycling centres for Waterside, Eglinton and the Castlederg area."

While the above statement may be true, it does not portray the true reality for many local residents who live in Strathfoyle/Maydown and the hinterlands of the rural Faughan DEA. To make this section of the LDP sound, it should be amended to include a specific chapter on the vast areas of 'Contaminated Land that exists within the Council area) (This should include maps and a strategy for site remediation and monitoring and review)

Mr examiner, I am concerned that this Draft Local Development Plan fails to outline the fact that the rural Faughan DEA of Derry/Strabane Distrcit Council area is also home to one of the biggest ever illegal landfill sites at Mobuoy Dump on Mobuoy Road. This highlights the failure of Derry City & Strabane District Councils ability to effectively manage waste disposal and treatment. Furthermore despite being discovered almost 8 years ago no waste has yet been removed from the site. This site continues to threaten the River Faughan on a daily basis which supplies 60% of the city and districts drinking water supply. In my view it is the single most important issue facing our city and district today and merits a new 'Chapter to be created'

within the Derry and Strabane LDP covering 'Waste and Contaminated Land'. This new chapter would help make the LDP sound.

In addition to Mobuoy Dump there are a number of other closed landfill sites in the area and a further number of other 'illegal landfill sites' that exist within Faughan. All of these sites should be listed within a new chapter in the LDP 'Waste & Contaminated Land' and should contain details of how these sites are monitored and cleaned up. This new chapter would help make the LDP sound.

In addition to Mobuoy Dump and the closed landfill sites and number of illegal landfill sites that exist within the city and district there are a further 22 'Tarry Waste' sites scattered across the rural Faughan DEA. All of these sites should be listed within a new chapter that should be created within the Derry & Strabane LDP 'Waste & Contaminated Land' and should contain details of how these sites are monitored and cleaned up. This new chapter would help make the LDP sound.

In addition to Mobuoy Dump, closed landfill sites, other illegal landfill sites and the 22 tarry waste sites there are other contaminated sites that are also of a great concerns to local people. Most notably is the contaminated ponds within the grounds of Dupont. All private waste sites such as these should be listed within a new chapter that should be created within the Derry & Strabane LDP 'Waste and Contaminated Land' and should contain details of how these sites are monitored and cleaned up. This new chapter would help make the LDP sound.

#### Paragraph 20.9

This outlines that the council strategy supports the 'proximity principle'. This is extremely important and it is in this regard that I again stress the importance of the full recommendation of the Ben Cave Health Impact Study report recommendations in relation to the proximity principle and the fact that local residents of Strathfoyle and Maydown already experience a number of adverse impacts as a direct result of residing beside high industry.

#### Policy WP 1 Environmental Impact of a Waste Management Facility

Any proposals for such facilities within the Strathfoyle/Lisahally/Maydown area must take full consideration of the Ben Cave 2015 Health Impact Assessment Report and associated recommendations.

#### 20.13

I would suggest that any future proposed waste facility sites within the Strathfoyle/Lisahally/Maydown area the precautionary approach must be looked at differently within this zone for reasons of imperative overriding public interest such as the findings of the Ben Cave, 2015 Health Impact Study.

#### 20.15

In relation to Strathfoyle/Lisahally/Maydown or as council and planners call it - 'The Harbour Development Zone' Council must also be guided by NINIS statistics, Cancer Cluster stats and the findings of the Ben Cave Health Impact Study 2015. Council and planners should also take into consideration the number of fires that have occurred at such sites, including incidents of air pollution, flea and rat infestations and the impact that this had on the local community. Council must do more to ascertain existing cumulative impact on local residents as a result of residing beside high industry.

Page 316:

- b)  
i - It is located within an industrial or port area of a character appropriate to the development

This could imply that such a location would exist within the Strathfoyle/Lisahally/Maydown areas or as council and planners have already called it within this LDP process the 'Harbour Development Zone'. It may be that, but it is also the home of some 3000 local residents and over the years we have watched the industrial area continue to grow to the extent where our lives have now been impacted in a negative way.

Industrial development within this area must take on board the needs, views and wishes of local residents. In the past planners and decision makers didn't even deem it necessary to consult with local residents on their plans. However this has helped build a sense of community resilience [REDACTED]  
[REDACTED] This is why we hope that our views will be giving appropriate consideration as part of this LDP process and also inform the NI Strategic Infrastructure Development Planning Department.

#### Paragraph 20.16

Thermal treatment of waste including incineration and gasification are included in the list of waste treatment projects for this policy.

This contravenes the councils corporate position in terms of rejecting incineration and gasification as a policy within the Derry City and Strabane District.

This contravenes the expressed wishes of citizens from right across this city and district who on three separate occasions have unanimously rejects gasification and incineration waste technologies.

#### Paragraph 20.18

This must also apply in relation to the ongoing monitoring and review of contaminated land sites within the city and district including Mobuoy Road Illegal Landfill site, other known illegal landfill sites, tarry waste sites and private hazardous sites such as that of the toxic dupont pond which continues to leach into the River Faughan which supplies 60% of the city and districts drinking water.

#### Policy WP 3 Waste Disposal

This Draft LDP should have a detailed chapter on 'Contaminated Land Sites' as there are a number of sites that the public are concerned about scattered throughout the city and district. Furthermore this chapter should outline plans for the ongoing management and review of such sites. Waste Contaminated Land Order 1997. Environmental Liability Directives.

#### Paragraph 20.25

This paragraph must go much further in terms of outlining all of the contaminated land sites that exist throughout the city and district. This paragraph needs to be linked to the wider chapter that I would propose on contaminated land within this LDP. Its important that Council recognises its very poor record in terms of managing waste and begins to face up to its responsibilities in the clean up and monitoring of sites already mentiuned, namely Mobuoy Road Illegal Landfill Site, Other Illegal Landfill sites, Tarry waste sites and private contaminated sites such as that of Duponts pond.

#### Policy WP 5

Citizens of Derry and Strabane District reserve the right to object to any future plans for gasification/incineration within he city and district. Any such plans for the Strathfoyle/Lisahally/Maydown area must take full account of the Ben Cave Health Impact Assessment recommendations. (This report was adopted by Derry City and Strabane District Council who also agreed to the full implementation of the reports recommendations)

#### Paragraph 20.31

Citizens of Derry and Strabane District reserve the right to object to any future plans for gasification/incineration within he city and district. Any such plans for the Strathfoyle/Lisahally/Maydown area must take full account of the Ben Cave Health Impact Assessment recommendations. (This report was adopted by Derry City and Strabane District Council who also agreed to the full implementation of the reports recommendations)