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From: enagh forum <enaghyf@gmail.com>
Sent: 24 January 2020 16:39
To: Local Development Plan; Planning
Subject: LDP Strathfoyle Community Response
Attachments: Response -Final (3).docx

To Whom It May Concern,

Please find attached a collective community response to Derry City & Strabane District Councils Draft Local Development Plan.

A signed hard copy will be hand delivered to Council Offices, 98 Strand Road, Derry on Monday morning.

Please acknowledge receipt of this correspondence.

Submitted by:

Paul Hughes

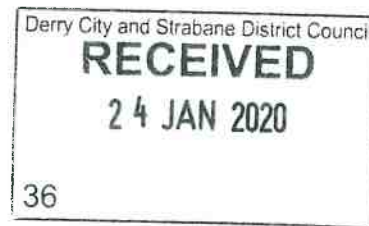
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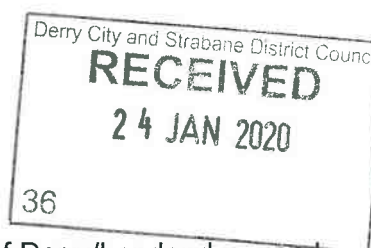
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Introduction

We appreciate the opportunity to participate in the development plan process and to represent the wider Strathfoyle and Maydown communities, specifically;

- (i) Enagh Youth Forum
- (ii) Enagh Seniors Group
- (iii) Maydown Community Association
- (iv) Strathfoyle Community Association
- (v) Strathfoyle Women's Activity Group
- (vi) Tiny Tots Community Play Group



The Area and Need

Strathfoyle is located some eight kilometres north east of Derry/Londonderry and approximately two kilometres from the A2 Derry/Londonderry to Coleraine Road. To the north it is bounded by industry and the port complex at Lisahally and to the south by the Area of High Scenic Value along the River Foyle banks.

The Port is Derry's key marine access point to the world and deals with a constant stream of freight and industrial cargo, which is distributed throughout Ireland from the Port.

The settlement was developed in phases between the late 1950's and the late 1960's, as a direct result of the ongoing industrial development at Maydown and its lay out is typical of post-war public housing estates.

Strathfoyle was more seriously developed after the war and in the 1950's it was established as a housing estate. The area which is commonly known throughout Strathfoyle as 'The New Estate' was built shortly after the erection of the first set of houses, in different phases spanning across three decades, the 1970's, 80's and 90's. Since the millennium, Strathfoyle seen a surge in popularity and is now seen as a 'choice location' for young families looking for residence.

The village facilities include a small retail unit comprising a pharmacy, supermarket, a fast food take-away and barbers' shop. The village also has a Roman Catholic Church, Nursery School, Primary School and Library. The North West Teachers Training Centre is also located in Strathfoyle. The area also has four locally established charitable community groups including Strathfoyle Women's Activity Group, Strathfoyle Community Association, Tiny Tots Community Play Group & Enagh Youth Forum.

St Oliver Plunkett Primary School provides education for around 221 pupils in the area. The school was established in 1975 and is the main primary school in the Strathfoyle and Greater Enagh area. The majority of post primary school students in Strathfoyle attend schools such as Oakgrove Integrated College, St Mary's High School in Limavady, or St Columb's College. Oakgrove Integrated College is located near to the village and is a popular choice among students due to its proximity with the village.

Enagh_1 (which includes Strathfoyle) is ranked at 180 out of 890 falls just outside the top 20% (ranked 1-178), its rankings on income deprivation (119) and health deprivation (176) fall with the 20%. Enagh_1 is ranked 68 on the standardized ratio of people receiving multiple prescriptions on a regular basis, with this rate being 53.7% above the Northern Ireland average. Also, the number of anti-social behaviour incidents per head of the population (41.1 per 1000 population) is ranked 164 and thus within the top 20%.

Our Representation

As acknowledged in the Draft Plan Strategy the LDP is the ‘spatial articulation’ of the Community Plan. Therefore, we feel it is important that this Strategy reflects the needs of the community we represent.

Our representation relates to the following sections of the draft Plan Strategy (dPS);

- (i) GDP 3 Improving Health and Wellbeing
- (ii) GDP 8 Development Principles: Preserving and Enhancing the Historic Environment
- (iii) GDPOL 1 General Development Management Policy
- (iv) HOU1 Strategic Allocation and Management of Housing Land
- (v) HOU 2 Strategic Allocation of Housing in Settlements – other than Zoned Housing Land and LUPAs
- (vi) HOU 5 Affordable Housing in Settlements
- (vii) ED 1 Economic Development in Settlements
- (viii) PDO 2 -Enhance the Value of the Natural Environment
- (ix) PDO 3 -Implement a Sustainable Transport Hierarchy
- (x) CTY3 The Setting of Settlements

GDP 3 Improving Health and Wellbeing

Policy

The Draft Plan Strategy states that the LDP will seek to ensure that development proposals make a positive contribution to the health and well-being of our District. Therefore, development proposals should take into account and demonstrate how they:

- (i) encourage active travel and how they are facilitating travel by public transport in preference to the private car
- (ii) make best use of and create meaningful multi-modal links to existing areas of open space, community facilities and centres as set out in the Retail chapter.
- (iii) provide for adequate private, semi-private and public amenity space in accordance with the Housing chapter.
- (iv) protect existing open space, natural and historic environment assets of the countryside and coast. (refer to Chapter 17 and GDP's 7 and 8)
- (v) do not significantly adversely impact air quality, particularly in problem areas where Air Quality Management Areas (AQMAs) have been designated by Environmental Health (refer also to GDPOL 1);
- (vi) do not have a significant adverse impact on health and well-being, including as a result of the nature of the use proposed. This will require the submission of a Health Impact Statement (HIA) for large scale developments where an environmental impact assessment (EIA) indicates that an environmental statement (ES) is required as health issues have been determined to be a significant environmental concern.
- (vii) contribute to creating / enhancing, shared space / cross-community and mixed / balanced communities (refer to GDP 5)

Our Response

Our Community would highlight that this policy is essential for the people of Strathfoyle and Maydown. The active transport (i) should be encouraged not least through the Strathfoyle Greenway which is discussed later. We are also keen that there should be shared space and balanced communities (vii) both within future residential areas but also within community facilities and spaces.

We would also draw the Council's attention to the air quality and the protection of open space, natural and historic environments along the coast (iv). This is important when considering further industrial/commercial development within and near the port which have the potential to impact on the residents of the area. Any proposal has to protect existing people and make a positive contribution to the health and wellbeing of our District.

It is important that the results and recommendations which emerged in the Ben Cave Report 'Industrial Facilities; Health Impact Study' (2015) are acknowledged and considered within the Local Development Plan process, as the report states '*the importance of an integrated approach to addressing the problems the community face*' .

GDP 8 Development Principles: Preserving and Enhancing the Historic Environment

Policy

The Draft Plan Strategy states that development affecting the historic environment should:

- (i) promote sustainable development and environmental stewardship with regard to our historic environment;
- (ii) secure the preservation, conservation and where possible, the enhancement of buildings and areas of cultural, historic or archaeological interest including conservation areas, historic parks, gardens, areas of archaeological interest and listed buildings and their settings;
- (iii) promote the enhancement of the historic environment through the use of high standards of design and careful choice of sustainable materials for all development;
- (iv) promote economic and community development through the sympathetic and appropriate reuse of existing buildings, especially those which make a contribution to the special character of their locality;
- (v) promote design that ensures a safe and secure environment;
- (vi) maximise opportunities for the use of sustainable construction techniques such as the re-use of building materials, sustainable drainage systems, renewable energy generation, water and energy efficiency, recycling and reuse to minimise waste in new developments;
- (vii) incorporate high quality design which results in usable, durable and adaptable places which reflect local distinctiveness.
- (viii) promote improvements in accessibility of the historic environment for all people regardless of age, gender, religious belief, political opinion or ethnicity

Our Response

The Draft Plan Strategy states *'our heritage assets play a key role in the economic, physical and social wellbeing of the District and for our citizens, businesses and visiting tourists. The importance of built heritage and regeneration features prominently within the Strategic Growth Plan. The historic environment is also at the core of the District's Tourism Development Strategy in terms of recognizing the contribution of historic 'gateway' locations throughout the District, which add to the overall visitor proposition and experience'*.

We would request the Council completes a review of the value and significance of the archaeological, historical and heritage of the local areas of Enagh Lough, The River Foyle & Lisahally. We are keen to ensure that all development promote sustainable development and environmental stewardship (i).

GDPOL 1 General Development Management Policy

Policy

The Draft Plan Strategy states that planning permission will be granted where:

- (i) there is no significant adverse impact on amenity (including privacy) as a result of light, noise, vibration, air pollution, dust and odours. This could also include proposals which would be sensitive to existing environmental conditions, such as noise;
- (ii) there will be no significant adverse impact on human health and the environment as a result of the potential for release of contaminants from contaminated lands;
- (iii) there is no significant adverse impact as a result of litter, vermin and birds; and
- (iv) the proposal meets the relevant requirements as set out in the Transport chapter;

Our Response

The close proximity of residential and community uses to industrial uses means that the residents of this area are at risk of having their residential amenity negatively impacted by existing and future development.

The Draft Plan Strategy states that the 'main port area is approximately 100ha and it is estimated that approximately 37ha of land remains available for development. This strategic development area will facilitate expansion of the port, including opportunities for improvement of berthing and dockside facilities. Other uses that would complement the port use and existing energy generation uses could be accommodated in this area' (p. 115).

The wider Strathfoyle and Maydown communities would like to ensure that this zoning does not result in industry growing exponentially in the area at the expense of other land uses such as housing and community facilities.

Again, we emphasise the importance of the Ben Cave Report which outlined the dominant negative environmental factors arising from industrial activities in the study area that participants at the community consultation events said affected people's health and wellbeing negatively were:

- (i) noise
- (ii) odour
- (iii) air pollution and airborne dust and other particulate materials
- (iv) vermin/infestations (rats and flies)
- (v) the volume and speed of HGVs in the local environment, which lead to risks for community and personal safety, increased noise levels, and increased air pollution associated with this traffic
- (vi) effect on property values
- (vii) physical activity and the local area no longer being a scenic place to walk
- (viii) loss of biodiversity
- (ix) the location, size and number of electricity pylons in the area.

HOU1 Strategic Allocation and Management of Housing Land

Policy

The Draft Plan Strategy states that *'within the villages and small settlements, the Council will identify Land Use Policy Areas (LUPAs) in the LPP. These will indicate where most new houses within the settlements will be located. Exceptions may be for social housing where a Housing Association demonstrates a need within a settlement that cannot be met inside a LUPA'*.

(p.226)

Our Response

There is a need for social housing within the Strathfoyle area and this is demonstrated in the response from the Housing Executive¹ which includes the following statistics

Strathfoyle Housing Need Assessment (HNA) area	Total (as 31 March 2019)
Applicant	57
Applicant deemed to be in Housing Stress	34
Homeless App.	30
Allocations	16

We would also highlight the Derry City and Strabane Housing Investment Plan 2019-2023 which outlines the fluctuating housing market within the district. It also highlights how low-income households can find difficulty accessing the owner-occupied market. With regard to the rental sector at March 2019 there were 662 private tenants in receipt of Housing Benefit² within the council area.

The percentage of social housing in the district is 21% which is above average when compared to the NI average of 15%³. As acknowledged in the Draft Plan Strategy housing need had increased between 2014 and 2019, and this is evident in the Strathfoyle and Maydown areas also. There is the added obstacle that Housing Association compete on the open market against the private sector and this can make it difficult for them to obtain sites in areas of housing need.

We would like to see land allocated to social housing within the Strathfoyle area. It is important that social housing is distributed across the district and meets the needs of people in the various areas. Again, we would highlight the fact that this area comprises people and communities and should not be overtaken by industry.

¹ Housing Executive FOI Response dated 10 July 2019

² Housing Investment Plan Private Rented Sector (p.170)

³ 2011 NI Census

HOU 2 Strategic Allocation of Housing in Settlements – other than Zoned Housing Land and LUPAs

Policy

The Draft Plan Strategy states it is the LDP's intent that all new housing development within the LDP area will be delivered on previously committed sites (see Policy HOU1) or within the existing settlement limit. This policy promotes the development of new housing on appropriate vacant and underutilised land to contribute to the regional target for 60% of new housing to be located in appropriate 'brownfield' sites. Therefore, Planning permission will be granted for housing developments on brownfield sites, small whiteland or open space (if it accords with Policy OS1) within the settlement limits which are not zoned for housing or mixed use (to include an element of housing), where the following criteria are met:

- a. The site is suitable for housing development;
- b. The location is accessible and convenient to public transport and walking and cycling infrastructure; and
- c. Provision is made for any additional infrastructure required as a result of the development, including its cumulative impact alongside committed and planned housing development.

Our Response

We would refer you to our response above regarding HOU1 and the accessibility fo Strathfoyle to the city.

HOU 5 Affordable Housing in Settlements

Policy

Affordable housing should consist of social rented housing and/or intermediate housing. In determining the appropriate mix of affordable housing in terms of size, type and tenure, regard will be had to NIHE's up-to-date analysis of demand, including housing stress and prevailing housing need.

Our Response

We would refer you to our response above regarding HOU1 and the need for social housing within the district. We also highlight the relevance of NIHE statistics, and the plan needs to be able to adapt if these change over the duration of the plan period.

ED 1 Economic Development in Settlements

Policy

(b) Villages and Small Settlement In villages and small settlements such proposals will be permitted where all of the following have been met:

(i) the land is identified as a Land Use Policy Area (LUPA) for economic development use

(ii) the scale, nature and design of the proposal are in keeping with the character and setting of the settlement and are centrally located;

(iii) the proposal is compatible with adjacent and nearby land uses, including residential.

Our Response

Within the Strathfoyle and Maydown Cluster Village Plan an action identified was addressing the air pollution from unpleasant smells from Foyle Meat and Docks. Furthermore, the Council should implement the recommendations made in the Ben Cave 2015 Health Impact Study.

The SPSS outlines the regional strategic objectives for facilitating economic development including *'to sustain a vibrant rural community by supporting rural economic development of an appropriate scale and nature'* and to *'promote mixed use development between transport, economic development and other land uses, including housing'*. As previously we would emphasise the importance of community and residents in the area, and it should not be only seen as an industrial area.

We would ask the Council to complete a review of land zoning and designations for the Strathfoyle Village (Derry Area Plan 2011) within this economic zone taking into full consideration the immediate and future needs of the Strathfoyle Village and its residents including access to amenities, health, housing and transport considerations including safe, sustainable travel and access to greenways (page 169 draft LDP) and rail travel. (A number of key actions have already been identified within the Faughan Strategic Growth Plan and Strathfoyle & Maydown Village Cluster Plan)

Furthermore, we would request that the Council fully implement the recommendations outlined in the Ben Cave (Health Impact Study Report) 2015 (Commissioned by Derry City & Strabane District Council); with particular focus on recommendation A and the 'cumulative impact' of existing industry on local residents.

However we feel it is important that we also outline local residents concerns at this LDP 'Plan Strategy Stage' due to the close proximity and Inter-linkage of Strathfoyle & Maydown in relation to co-existing with the 'Economic Zone' at Lisahally and the proposed 'Harbour Development Zone' which has already being submitted as part of the LDP process under 'Economy Strategy'.

The Draft Plan Strategy states that the *'LDP system aims to move away from a narrow land use focus towards a 'place shaping' approach that incorporates a spatial analysis and visioning process⁴.*

⁴ Draft Plan Strategy -Linkage between LDP & Community Plan (para 3.3, p. 35)

PDO 2 -Enhance the Value of the Natural Environment

Policy

Place-making and Design Principle 6 (PDP 6) to Improve Environmental Conditions.

Our Response

Within the Strathfoyle and Maydown Cluster Village Plan there are several priority actions including

- (i) Exploring the potential upgrade of the current village green (Strathfoyle)
- (ii) Exploring improved conservation and improved protection of Enagh Lough and ensuring the protection of wildlife, flora and fauna within the lough area
- (iii) Further promotion of the villages and Enagh Lough as a tourist destination

To the immediate West of Strathfoyle is an Area of High Scenic Value (Derry Area Plan 2011). This abuts the River Foyle and it is imperative that this is protected. Furthermore, there is an Area of Local Nature Conservation and Amenity Importance

'There are 3 rivers that enter Lough Foyle – Foyle, Faughan and Muff. The Foyle and Faughan rivers are particularly significant, because they support Atlantic salmon, brown trout and sea trout. Part of the Foyle estuary and the whole of the Faughan estuary fall within the SPA, ASSI and RAMSAR designations of Lough Foyle. These estuaries and tidal rivers provide essential spawning sites for the following priority species: shad, European smelt and lampreys. Also, the rivers provide an important habitat for otters, kingfishers and sand martins. The Skeoge River drains westwards towards Donegal and Lough Swilly, which is also a European-protected site' (Para 2.28 p.24).

We would also emphasise the importance of Policy OS1 Protection of Open Space which states 'the presumption against the loss of existing open space will apply irrespective of its physical condition and appearance, public access or ownership' (p.280). Open space contributes to the character of the area and provides community space as well as enhancing nature conservation and biodiversity.

PDO 3 -Implement a Sustainable Transport Hierarchy

Policy

The Draft Plan Strategy states '*this must involve facilitating an increased modal shift to walking, cycling and public transport, thereby reducing the harmful local effects such as air pollution, physical inactivity, road congestion and visual blight*' (26.17, p.403). It further states that the 'needs of pedestrians, cyclists and public transport users must be increasingly prioritised over car-based development. This hierarchy should be taken into full account in all decision making, from planning to investment' (26.18, p. 403)

Our Response

We have been proactive in trying to establish a Strathfoyle Greenway to serve residents and visitors to the area. Planning permission was granted in 2012 under reference A/2012/0430/F. The proposed greenway will run parallel with the railway passes through Strathfoyle pitches and play area and through Gransha Estate, Oakgrove School and Strafown Drive. This needs to be a priority for the Council as it is evident that it will benefit the entire community. It was also a Priority Level 1 action within the Strathfoyle and Maydown Cluster Village Action Plan

This was also highlighted in the Community Plan which aims to '*promote modal shift away from use of the private car towards sustainable travel including use of cycling and walking through the development of our greenways -including extension of waterside greenway to Strathfoyle....*'⁵

⁵ **Community Plan -Environment and Regeneration -Key Actions (p.47)**

CTY3 The Setting of Settlements

Policy

The Draft Plan Strategy states that '*planning permission will be refused for development that mars the distinction between a settlement and the surrounding countryside or that otherwise results in urban sprawl*'.

Our Response

It is important that the village identity is maintained and to highlight that this area is separate from Derry City. In 'Place-Marking & Design Vision / Policy for Small Settlements' (p. 440) the Draft Plan Strategy states that planning permission will be granted for development proposals provided they are of a high standard and

- (i) Are sensitive to and make a positive contribution to the character of the settlement
- (ii) Are in keeping with the size and character of the settlement
- (iii) Do not lead either individually or cumulatively to a loss of amenity
- (iv) Respect the opportunities and constraints of the specific site and have regard to the potential to create a new sense of place through sensitive design
- (v) Comply with all other relevant LDP policies and in particular GDPOL 2

(Paragraph 31.2, p. 440)

We would like to ensure that this area is not taken over by either the city of Derry or by the industrial port area. It is important that it maintains its identity as a separate village.

Conclusion

We acknowledge the benefits from industry and commercial enterprises in the wider Strathfoyle and Maydown area. These have provided employment and therefore injected capital in the economy. However, it is important to acknowledge that both Maydown and Strathfoyle are villages and the character of these villages should be protected. These villages also are places where people live and use community facilities e.g. schools and youth clubs.

The future development plan must strike the correct balance whereby the residents of the area also have their views heard. This plan should *'facilitate sustainable growth by co-ordinating public and private investment to encourage development where it can be of most benefit to the well-being of the community'* and *'provide an opportunity for all stakeholders, including the public, to have a say about where and how development within their local area should take place'*.⁶

⁶ Draft Plan Strategy -The Local Development Plan (Para 1.13, p. 10)