

**Hannah Flynn**

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**From:** Local Development Plan  
**Subject:** FW: DfC Historic Environment Division response to LDP Proposed Changes consultation  
**Attachments:** HED response ref Derry and Strabane DPS Proposed Changes.pdf

**From**  
**Sent:** 28 January 2022 10:22  
**To:** Local Development Plan ; Lindsay McCorkell  
**Cc:**  
**Subject:** DfC Historic Environment Division response to LDP Proposed Changes consultation

Dear Lindsay

**DfC: Historic Environment Division comments: Derry City and Strabane District Council Local Development Plan 2032, Draft Plan Strategy, Schedule of Proposed Changes, November 2021.**

Please see attached the Historic Environment Division response to the above consultation. All in all HED welcome the changes that have been made in relation to the historic environment policy suite. In relation to some of the changes in the schedule we have provided some advice that we trust will be of use in addressing minor matters including typos and what we perceive to be accidental inaccuracies in the document.

We'd request that our names and signatures be redacted for the purposes of publication of our comments and would be grateful for an acknowledgement of receipt of this email.

If there's any queries around the content of our response we contacted via email or through the address in the letter.

Regards

Senior Archaeologist | Heritage Records and Designations Branch

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Date: 28/01/2022

Dear Sir/Madam

**DfC: Historic Environment Division comments: Derry City and Strabane District Council Local Development Plan 2032, Draft Plan Strategy, Schedule of Proposed Changes, November 2021.**

Thank you for the opportunity to comment on the above documentation. Historic Environment Division (HED) has reviewed the Schedule of Proposed Changes and overall welcome the changes that have been made in reference to many of the comments made in our representation **LDP-PS-079**, particularly those in relation to the Historic Environment Chapter. We consider that these changes articulated in the schedule address most of the issues of soundness raised by us in relation to many of the specific concerns articulated in our representation. Across other areas where we have highlighted concerns in our representation that are not considered here within the schedule, our original comments in LDP-PS-079 apply.

In relation to the schedule document we make the following observations to assist the council

- **PC 99** – TOU 4. Para 12.22 Typo: Reference to HE 3 (Development adjacent to the Walls) in the policy text should read HE 8 (Conversion and Re-Use of Non-Designated Heritage Assets). Use of terminology between the policy head note (bullet point 4) and clarification text relating to a 'historic building of local importance' and 'non-designated locally important building' should be consistent.
- **PC 120** – AGR 3/ ODC4 HED welcomes the amendment to criterion (h) to include the historic environment chapters. To align with this change and ensure that the policy is consistent within itself and other policies, HED advises that para 15.19 should also reference Historic Environment Policy, namely HE8.
- **PC 145** – Para 16.97 makes reference to the Council's own 'Historic Environment

SPG'. HED welcomes consultation on any proposed SPG relating to the historic environment.

- **PC168.** UT3, 3<sup>rd</sup> bullet point. The justification for the proposed change is that it is toward making clear that the policy does not just apply to designated areas, however the proposed policy wording states **"or affecting designations related to the Natural and or/Historic Environment....."** , which implies reference only to designations. In relation to the Historic Environment, heritage assets, e.g such as historic parks gardens and demesnes, or archaeological sites of local importance are not designated as such, but which are recorded heritage assets to which the regional strategic policy and the plan's historic environment policies apply. We advise that amendment of this line to read **"or affecting Natural environment designations or heritage assets....."** would provide the necessary clarity in cross referencing to the council's historic environment suite.
- **PC190.** Para 3.10. HED highlight a minor error here where the proposed change references ASAI as "Areas of Significant Archaeological Potential". This should read **"Areas of Significant Archaeological Interest."**

HED are grateful for the positive and meaningful engagement with the council toward creating policies in the LDP for the continued protection, conservation and enhancement of the historic environment. Should you have any queries around the content of our response we can be contacted at the address above.

Yours sincerely

Senior Archaeologist

Senior Architect

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