

**Chloe Duddy**

**From:** Sinead McEvoy <Sinead.McEvoy@midulstercouncil.org>  
**Sent:** 15 January 2020 13:03  
**To:** Local Development Plan  
**Cc:** Sarah-jayne Boyle; Proinsias McCaughey; Chris Boomer; Roisin McAllister; Michael McGibbon  
**Subject:** RE: Derry-Strabane LDP Draft Plan Strategy Notification  
**Attachments:** MUDC response to DS DPS.pdf

Good afternoon,

In response to your consultation on your Local Development Plan Draft Plan Strategy, please find attached a response on behalf of Mid Ulster District Council.

Kind regards

Sinead McEvoy  
Head of Development Plan

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Mid Ulster District Council  
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**From:** Sarah-jayne Boyle <Sarah-Jayne.Boyle@Derrystrabane.com>  
**Sent:** 29 November 2019 12:23  
**To:** Sinead McEvoy <Sinead.McEvoy@midulstercouncil.org>  
**Subject:** Derry-Strabane LDP Draft Plan Strategy Notification

Good Afternoon,

Please see attached letter - Derry-Strabane LDP Draft Plan Strategy Notification.

Please confirm, by return, that you have received this e-mail and that you are the correct contact person or department / section in your organization to deal with this LDP consultation. (Please note that more than one letter may have been sent to your organization, so please co-ordinate with any of your other departments / sections that are considered relevant.)

Regards,

Sarah-Jayne

**Sarah-Jayne Boyle**  
**Administration Supervisor**

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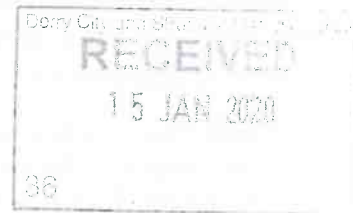
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Date: 15 January 2020

Dear Proinsias,

Re: Local Development Plan – Consultation on Draft Plan Strategy

I write to acknowledge and respond to your recent consultation in accordance with Regulation 15 of The Planning (Local Development Plan) Regulations (Northern Ireland) 2015.

Mid Ulster District Council welcome this consultation and opportunity to respond to your draft Plan Strategy. As you are aware, we have discussed a number of cross boundary issues as part of the Sperrins Forum and have progressed these discussions towards the production of a draft Statement of Common Ground. The main issues agreed to be of particular cross border interest between our two Councils are;

- Protection of landscapes and environmental assets through appropriate environmental designations;
- Management of minerals development;
- Improvement of road linkages and infrastructure;
- Sustainable tourism development.

This response is therefore structured accordingly around these areas of common ground.

**Derry City and Strabane District Council Spatial Growth Strategy.**

Whilst not an issue discussed at the Sperrins Forum, we note your growth strategy which sets out how the future growth of housing and employment will be accommodated within the Derry and Strabane District. This helps set the context within which other common issues will be discussed.

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### Spatial Growth Strategy

The Draft Plan Strategy has set out Derry City and Strabane District Council's position in relation to future growth. Derry City is defined as a principal city linked with Letterkenny as the main driving force behind an expanding North West Region. Strabane is identified as the main hub town which will also continue to be a destination for economic growth and housing development. The smaller settlements and the countryside will be sustained and continue to be vibrant places where people can live and work in a sustainable manner.

In terms of job creation, the draft Strategy aims to create 15,000 new jobs over the Plan period, with the main focus of these jobs being on Derry City and to a lesser extent, Strabane and the local towns.

The Draft Plan Strategy also aims to provide for approximately 9000 new houses and it is noted that the majority of these are to be built in Derry City - 55-65% with 12-16% being located in the countryside. In terms of Strabane, the Local Towns, Villages and Small settlements, they will receive their "fair share" of the housing allocation proportionate to the current level of housing provision.

We also note that key environmental assets such as the Sperrins and other areas of landscape importance will be protected via the introduction of a Special Countryside Area (SCA) and Area of High Landscape Importance (AHLI) designations and while indicated on the Plan Strategy Proposals Maps of District – Settlement and Environment - map 2 at a district wide scale, closer detailed mapping has not been provided. Wind Energy Capacity Areas (WECAs) will also be introduced to reflect areas which are felt to be at or reaching capacity in terms of wind energy development. Greenbelts will be introduced around Derry and Strabane to contain urban sprawl and development pressure.

### Protection of Landscapes

MUDC note the proposed designation of a Special Countryside Area (SCA) in the High Sperrins and the associated policy (NE 6). NE 6 states that development within an SCA will not be permitted unless it falls into one of three scenarios, namely, that it is of regional or national importance, consists of consolidation of existing development or that it constitutes minor works or improvements for the purposes of tourism development.

It is considered that the introduction of this designation is in keeping with the Sperrins Forum draft Statement of Common Ground. MUDC's draft Plan Strategy also includes a proposed SCA, which lies adjacent to this proposed designation. We are therefore supportive of the introduction of this designation as it will ensure consistency of approach between our two districts in relation to the protection of our most unique and important landscapes.

We also note the introduction of an Area of High Landscape Importance (AHLI) designation, the purpose of which is also to protect important landscapes. Again we are supportive of them as they conform with the Draft Statement of Common Ground which recognises a need for the protection of our sensitive landscapes and environmental assets and, in particular, the integrity of the Sperrin AONB

designation. How this additional protection is achieved is a matter for each individual Council.

In relation to wind turbine development within the high Sperrins, the land immediately bordering the Mid Ulster District is to be protected by the aforementioned SCA designation and this is again welcomed by MUDC. MUDC have adopted a similar approach but have also introduced an Area of Constraint on Wind Turbines and High Structures (AOCWTHS) on the lower slopes of the Sperrins wherein, wind turbine development (and other high structures) will be restricted to below 15m in height.

We note that the Draft Plan Strategy introduces Wind Energy Capacity Areas (WECAs). These are areas which are currently undefined which have experienced a disproportionate amount of wind energy development and wherein careful consideration must be given to avoiding further intensification of negative landscape impacts.

In relation to telecommunications development and the potentially adverse impacts that it can have upon our unique landscapes, we note that under Policy UT 3, such development appears to be permissible in a SCA designation if its resultant impacts upon landscape are considered and mitigated against. This would appear to be in conflict with the provisions of policy NE 6, which rule out all development within an SCA unless it falls into one of three scenarios. MUDC would query whether there is potential conflict between these policies as a means whereby inappropriate development within the SCA may be permitted.

#### Management of Minerals Development

MUDC note and are in agreement with the strategic aim in relation to minerals, which is to promote minerals development in sustainable locations while protecting the unique areas of landscape within the District. This approach is in keeping with the Sperrins Forum draft Statement of Common Ground and is a similar strategic approach to that adopted in Mid Ulster.

The strategic approach is to be implemented via the introduction of Mineral Reserve Areas (MRAs) and Areas of Constraint on Mineral Development (ACMDs). These designations have not been identified in the draft Strategy. ACMD's will correlate with the SCA and AHLI designations and will be brought forward in the Local Policies Plan. In the interim period, the existing ACMDs in the Derry Area Plan 2011 will be used in conjunction with policy MIN 2. The area in proximity to our boundary will be protected from inappropriate development via the SCA designation and the AHLI designation, the latter of which appears to be a de facto ACMD designation.

In relation to valuable minerals, we note that there will not be a presumption against their exploitation in any location, apart from within an SCA which is in line with the SPPS.

We welcome the stance on the extraction of unconventional hydrocarbons, which is in keeping with the approach advocated in the SPPS and with the approach put forward in our draft Strategy.

### Sustainable Tourism Development

We note the strategic approach to tourism in the draft Strategy which aims to direct tourism development to Derry City and other key settlements, as this where the main potential for economic benefit is located. In addition, there will be protection offered to the main tourism assets within the District, such as the Sperrins. Policy TOU 1 however does permit development for tourism within the Sperrin AONB which does not significantly compromise the overall value of the tourism asset and which is in keeping with the relevant natural heritage policies.

MUDC are supportive of this strategy as it is in keeping with the draft Statement of Common Ground. The strategic approach will afford appropriate protection to our shared tourism assets, particularly the Sperrin AONB whilst at the same time maximising the economic benefits of the tourism industry. We recognise that due to the presence of Derry City, a significant cultural and historic city, the tourism industry in Derry and Strabane district is more vibrant than that currently on offer in Mid Ulster. Therefore, it is logical to continue to direct tourism development primarily towards the city.

Mid Ulster however, currently has one of the most underdeveloped tourism industries in Northern Ireland and therefore our tourism strategy seeks to allow a degree of flexibility for large scale tourism development in association with our key tourism assets such as Lough Neagh, the Sperrins and Davagh Forest. This will be achieved via the implementation of planning policy as well as through the designation of Tourism Opportunity Zones (TOZ) and Tourism Conservation Zones (TCZ). These designations will enable flexibility towards tourism development whilst also protecting our most valuable tourism assets.

### Road Linkages and Infrastructure

In relation to road linkages, there is one main transport corridor which links our two districts (albeit not directly) and that is the A6. As is acknowledged in your draft Strategy, work on the improvement of this transport corridor is ongoing and is dependent upon central government funding.

MUDC also note and support the strategic approach endorsed in your draft Strategy of endeavouring to bring about a modal shift towards public transport and active travel, although this is also dependent on funding from central government. We also note the promotion of initiatives such as bus lanes and "glider" services.

### Meeting Peoples Needs

MUDC are supportive of the approach taken in the draft Plan Strategy which seeks to concentrate on Derry City as the main focus of services, housing and economic development. Derry City is classed as a Principal City in the RDS and it is therefore appropriate that it should be the main focus of the draft Strategy, in this regard. Strabane is defined as a main hub in the RDS and will also be a focus for services, housing and job creation in the LDP. MUDC support the Hierarchy of Centres (HC1) as identified in the draft Plan Strategy.

CONCLUSION

In relation to **these** cross boundary issues and in line with the tests of soundness, subject to clarification on the perceived conflict between policies NE 6 and UT 3, we consider there to be no **perceived** conflict with Mid Ulster District Council's draft Plan Strategy.

Yours sincerely,



Sinead McEvoy  
Principal Planning Officer – Head of Development Plan

On behalf of Dr. Chris Boomer, Planning Manager.