
From: enagh forum
Sent: 22 January 2021 11:39
To: Local Development Plan; Planning;
Subject: EYF Counter Representation LDP-PS-REP-18
Follow Up Flag: Follow up
Flag Status: Completed

FAO: Derry/Strabane LDP Team

Enagh Youth Forum wish to submit this Counter Representation in relation to Foyle Ports representation to the Draft LDP (LDP-PS-REP-18) submitted by of Gravis Planning on behalf of Foyle Port.

Specifically page 6 of the submission which refers to the Draft LDP 'Employment Opportunity Areas - **Special Economic Development Areas (SEDA's)**

Special Economic Development Areas (SEDA's) are identified within the draft Plan Strategy and Foyle Port is identified as a SEDA. It is mentioned that the primary Foyle Port area is approximately 100ha and it is estimated 37ha of land remains available for development.

We have been instructed by residents in our local community of Strathfoyle and Maydown to strongly challenge, oppose and object to the wording listed below as submitted in Foyle Ports representation to the draft LDP. We reject all of the statement listed below. Foyle Port had and has no right whatsoever to proclaim that all of the existing land that exists between Strathfoyle and Maydown to the east towards the River Faughan falls within a 'self proclaimed 'Harbour Development Zone'. This is false. Foyle Port are acutely aware of our communities seeking to challenge the current land designations in Derry Area Plan from 'Proposed Industry' to 'Light Industry, Community Amenity and Housing' in line with our local Strathfoyle and Maydown Village Cluster Plan as co-developed between residents, community groups and council over a number of recent years. Our local community plan and the wider community plan for the Faughan DEA area (Already adopted by DCSDC) includes in its actions the need for the recommendations outlined in the Ben Cave Health Impact Assessment Report to be implemented (This report was commissioned by DCSDC in 2015, produced by Ben Cave Associates and subsequently adopted by DCSDC. This is important as the key recommendation emerging from the report calls on council to use its planning powers carefully in this area to develop a plan for the area that accommodates both the need for industry and the needs and future needs of the local communities.

We therefore refute all of the claims made by Foyle Port in their submission. We appeal to DCSDC not to implement or accept Foyle Ports Development Framework Plan which they have also submitted to the Northern and Western Regional Assembly. This is despite not a single resident in Strathfoyle or Maydown having been consulted. The lands are not the Ports. They are not within any Harbour Development Zone as it does not exist. It has been created by Foyle Port with the sole purpose of attempting to influence policy change and land designation change in what can only be described as a colossal land grab that neglects the rural communities of Strathfoyle and Maydown, the needs of the local community and the health and well-being of the local population.

Who are Foyle Port to deem or even comment on what development proposals are suited to this area? This is something that Council and the Planning Appeals Commission must carefully consider.

Even now as I type this response, Foyle Port is actively pursuing a land purchase bidding process on lands that the local community contest should be re-zoned for 'light industry, business start ups, housing and

community amenity'. They do this clear in the knowledge that as local community groups we are seeking to have the land rezoned to assist with meeting community need and advancing the regeneration plans of our local rural communities. We reserve the right to continue to call out Foyle Port and what they are doing to our communities. We reserve the right to continue to object, oppose and offer an alternative viewpoint to council and planners and decision makers because what is happening hear is very wrong.

All of this statement below needs to be fact checked taking into consideration the views of local residents and the needs of the local community.

We agree with the current designation/zoning of Foyle Port as 'Existing Industry'.

We challenge and do not agree with the current designation/zoning of many of the lands that exist between Strathfoyle and Maydown as 'Proposed Industry'. We ask that these lands be reviewed urgently as part of this process.

People Matter

Our Community Matters

Our Health & Well-Being Matters

Our Community Plan Matters

Please immediately furnish me with a copy of receipt of this 'Counter Representation'.

Thank you for the opportunity, (Foyle Port Submission Abstract Below)

Kind Regards,

Youth & Community Development Worker
Enagh Youth Forum

Foyle Port Submission Abstract (LDP-PS-REP-18)

"This strategic development area will facilitate expansion of the port, including opportunities for improvement of berthing and dockside facilities. It is said that other uses that would compliment the port use and existing energy generation uses could be accommodated in this area. Further relevant planning policy sets out in Policy ED 1 General criteria for Economic Development, Policy Ed 3 Economic Development in Settlements and Policy ED 4 Protection of Zoned and Established Economic Development Land and Uses.

We would advise that whilst the main port operational area is approximately 100ha; the wider port area extends from the Maydown Roundabout to the south to Lough Foyle in the north and from Strathfoyle to the west to the River Faughan in the east (accounting for c.427ha.) Foyle Port considers this area to be a 'Harbour Development Zone' (as identified in the Ports Development Framework Plan); which contains businesses and industries that are directly or indirectly linked to port operations. Furthermore, Foyle Ports Development Framework Plan identifies a total of 83ha. of lands remaining available for development within the 'Harbour Development Zone'.

We fully support the inclusion of Foyle Port as a SEDA within the dPS, given that The Derry Area Plan 2011 lacks specific industrial/employment policies and there is little direction given in the extant area plan in relation to what zoned lands should or could be developed for. However, we would encourage the council to extend any further Port SEDA designation/zoning to cover the wider Port area as detailed in Foyle Ports Development Framework Plan.

It is currently left to the market and regional planning policy to decide what is or isnt acceptable or appropriate on these sites. This has resulted in largely ad-hoc economic development occurring throughout the city, with some zoned areas totally undeveloped due to poor connectivity or inappropriate neighbouring uses whilst other areas (some that arent zoned for industrial/employment sites having experienced levels of growth.

The wider port area is covered by two zonings in the extant area plan - the majority of the port area is zoned as an area of existing industry, with a 'finger' of land stretching out from Starthfoyle zoned as proposed industry. These zonings, and lack of any associated policies/direction, have allowed both appropriate and inappropriate developments to occur in the port area over the last number of years.

In the absence of any specific policy or direction in relation to development in the Port area, Foyle Port took the decision to develop a Development Framework Plan to help guide future development proposals in the area, which we would encourage the Council to review and incorporate whilst preparing the next stage of the LDP Process - The Local Policies Plan."

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