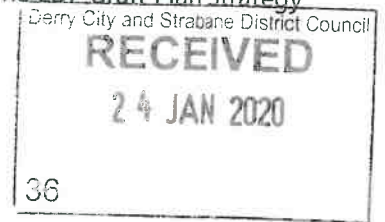


# LDP-PS-REP-18

**Sarah-jayne Boyle**

**From:** Lisa Shannon <lshannon@gravisplanning.com>  
**Sent:** 24 January 2020 15:23  
**To:** Local Development Plan  
**Cc:** Chris Bryson  
**Subject:** Representations form for the Derry and Strabane LDP draft Plan Strategy  
**Attachments:** Foyle Port Derry Repls Submission .pdf

**Importance:** High



Dear Sir/Madam,

Please find attached representation on behalf of our client, Foyle Port, in respect of Council's draft Plan Strategy. A hard copy will also be sent out by post today.

I would be grateful if you could acknowledge receipt of the submission by return email.

Kind regards,



LISA SHANNON

Consultant, Planning

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**BY EMAIL AND POST**

24<sup>th</sup> January 2020

Our Ref: C04321

Planning LDP Team  
Derry City and Strabane District Council  
98 Strand Road,  
Derry,  
BT48 7NN



Dear Sir/Madam,

**Re: Derry City and Strabane District Council Local Development Plan – Response to the Draft Plan Strategy on behalf of Foyle Port**

This letter is submitted on behalf of our client, Foyle Port and relates to the publication of the Derry City and Strabane District Council draft Plan Strategy, which was launched by the Council on Monday 2<sup>nd</sup> December 2019. It highlights how some draft policies are not sound and proposes how such policies could be amended to become sound. In addition to this, we draw your attention to specific lands that we have identified as being suitable for housing in order to contribute towards meeting the housing need for the district as set out in the strategy.

Development Plan Practice Note 6 sets out 3 main tests of soundness for Local Development Plans, with each test having a number of criteria, as follows:

Procedural Tests

- P1 *Has the DPD been prepared in accordance with the council's timetable and the Statement of Community Involvement?*
- P2 *Has the council prepared its Preferred Options Paper and taken into account any representations made?*
- P3 *Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?*
- P4 *Did the council comply with the regulations on the form and content of its DPD and procedure for preparing the DPD?*

Consistency Tests

- C1 *Did the council take account of the Regional Development Strategy?*
- C2 *Did the council take account of its Community Plan?*
- C3 *Did the council take account of policy and guidance issued by the Department?*
- C4 *Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?*

### Coherence and Effectiveness Tests

- CE1 *The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;*
- CE2 *The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;*
- CE3 *There are clear mechanisms for implementation and monitoring; and*
- CE4 *It is reasonably flexible to enable it to deal with changing circumstances.*

### Derry City and Strabane District Council Vision

*To make Derry City and Strabane District a thriving, prosperous and sustainable area – Planning for balanced and appropriate high-quality development, whilst protecting our environment, and also promoting well-being with equality of opportunity for all.*

We **support** this vision as it reflects the Council aspirations for the area to be a thriving, prosperous and sustainable area. It sets out the Council will plan for balanced and appropriate high-quality development, whilst protecting the environment. It also sets out that wellbeing and quality of opportunity for all is also important.

### Spatial and Cross Cutting Objectives

The LDP aims to deliver its vision through the main strategic objectives which are categorised broadly into spatial/cross-cutting objectives; economic development objectives; social development objectives and environmental objectives.

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We are **generally supportive** of these objectives in principle specifically criterion (ii) under the objective '*planning for a sustainable District with a strong Derry, Strabane and vibrant rural communities as the focus of the North West region*'. The criterion's objective is to develop and reinforce Derry City as the core settlement, regional gateway and principal city of the North West, providing employment, administration, commerce, specialised services, cultural amenities and tourism / visitor facilities as well as shopping health, education and leisure services, particularly for the cross-border population within the one-hour drive time across the North West Region.

We are also **generally supportive** of the Economic Development Objectives in creating jobs and promoting prosperity. Objective (i) aims to facilitate the creation of approximately 15,000 new jobs by 2032, based upon projected population increase, reduced unemployment rates and investment-driven growth, focussed on the identified growth sectors, at a variety of locations where they are accessible to all members of the community, including those without a private car. Whilst we agree in principle with this objective, we disagree with the job creation figure and believe it should be higher, this is discussed in further detail later within the representation.

Foyle Port **fully support** and welcome economic objective (vi) which aims to facilitate the City to capitalise on its role as a key cross-border and international gateway providing access by road, air, rail, and sea; whilst similarly maximising the economic corridor potential for Strabane and the rest of the District of the cross-border and A2, A5 and A6 improvement schemes to the North West. Foyle Port currently fulfils the role of a marine gateway for the North West region, on both sides of the border, and it is the main import/export destination for a range of products entering and leaving the Northern Irish and Republic of Ireland markets. To this end, we encourage the Council to pursue policies and designations in the Local Development Plan that will tie in with the objectives of the North West Regional Spatial and Economic Strategy and enhance the Port's role as a key cross-border and international gateway.

Foyle Port enjoy a close working relationship with Donegal County Council and many of the Port's services are used by the neighbouring County Council. On this basis, we welcome and endorse economic objective (vii) that seeks to continue the high level of co-operation between Letterkenny, Derry and Strabane. We would suggest that this objective is broadened to include Donegal County Council rather than just Letterkenny, and to acknowledge the area's role as a 'City Region' for the North West of Ireland .

### **Growth Strategy**

Recent joint studies by Donegal County Council and Derry City and Strabane District Council (DCSDC) have identified the realistic yet ambitious pathway to growth of the region over the next 15 years. It is noted that the continued development of Foyle Port is listed as one of a number of proposals/projects that will underpin the District's planned growth (section 5.3, p.50).

Furthermore, extensive investment in infrastructure, including the A5 and A6 dual carriageways, and the A2 Buncrana Road upgrade is also noted. Good road transport links to the Port are essential to sustain and improve import/export trade. Foyle Port welcomes the A5 and A6 upgrade works that will greatly improve such links and make the Port a more attractive investments proposition in the future.

Paragraph 5.6 of the draft Plan Strategy states that the Council Area in 2017, had a population of approximately 150,000. There were approximately 55,800 employee jobs in the District in 2017, with an improving trend over the past five years. There was a baseline of around 61,000 dwellings in the District in 2017, with building levels having been very low over the previous decade due to the serious economic downturn.

The current NISRA population growth projections (2016-based, dated 2018) are that the District will grow to a peak of approximately 151,000 in 2022 and then fall back to 149,000 by 2032. The related 2016-based Housing Growth Indicator (HGI, Sept 2019) figures from DfI/RDS give an indicator of just 4,100 additional dwellings required. Similar modest projections are for job growth of just 4,000 extra jobs over the period. NISRA is clear that these population projections are not forecasts and are based solely on historical fertility, mortality and migration rates. Thus, the projections do not take account of any planned policy changes (social or economic – such as the SGP) that could alter the levels of population.

It is noted that the Strategic Growth Plan (SGP) 2017-2032 'Our Community Plan' for the District sets out the ambition of increasing the District's population by approximately 10,000 to around 160,000; due to Council's more ambitious aspirations for 'planned growth'. This level of growth is based upon approximately 15,000 new jobs and would require up to 10,000 new homes over the Plan period to 2032.

However, if the local economy were to reach its full potential growth ambition (i.e. full implementation of the SGP as well as favourable wider economic climate, inward migration (which is considered to be very possible post-Brexit) and significant levels of inward investment); exponential jobs growth will result. On this basis, it could be anticipated that the District's population could actually grow to c.170,000, with between 16,000-18,000 new jobs created and up to 15,000 new homes would be required to meet that growth (see column 3 of the below table). This scenario is based on a Derry/Londonderry City Region model.

Table 6: Overall Growth Strategy for Derry City & Strabane District

Growth Strategy – Key Elements	Current Baseline, 2017	Current Projections – Modest Growth	LDP Growth Strategy – Planned Growth	Potential Growth – as a City Region
Population	150,000	149-150k	155-160k	160-170k
Jobs	55,800	+ 4k	+ 8-15k	+ 16-19k
Homes	61,000	+ 4.1k	+8-10k	+11-15k

In May 2019, the Council were successful in securing Central Government funding through a 'City Deal' for the Derry-Londonderry region. This City Deal funding is based on Derry-Londonderry being a City Region and reflects the aspirations and objectives set out in the Council's SGP.

The dPS bases the Growth Strategy on 'planned growth' rather than the City Region model (i.e. 'potential growth'). Such an approach conflicts with other existing Council growth strategies such as the SGP and appears to undermine the rationale for the City Deal funding.

On this basis, we **disagree** with the dPS Growth Strategy being based on 'planned growth' and consider that the council should base growth projections in the LDP on the 'potential growth' scenario, in order to align with other Council growth strategy documents. In order for Derry to fulfil its aim of being a key cross-border and international gateway; we consider that the Council should be more ambitious in relation to its growth strategy.

The current planned growth strategy approach fails to take into account a changing political and economic environment and unforeseen future developments that could result in higher levels of growth over the plan period. For example, reference is made in section 5.5 to the opportunities presented by 'Brexit' that could include related favourable tax rates, property prices and health, for businesses, commerce, trading, distribution / logistics, employment, and population growth / relocation to within this District. Derry is uniquely positioned on the border with a neighbouring EU member state to take advantage of any opportunities that arise from 'Brexit' and the Port has established a good relationship with the Republic of Ireland in terms of importing/exporting. While

some businesses may view 'Brexit' as a challenge or threat, we believe that Derry, and the Port in particular, are well positioned to capitalise on new emerging markets and trade arrangements.

The new Local Development Plan should aim to respond to and provide for such opportunities rather than set an overly cautious framework for future growth, development and investment.

### **Spatial Strategy**

The spatial strategy sets out the settlement hierarchy, the main environmental areas, transport corridors and other main infrastructure features, as well as the general spatial strategy for Derry City and Strabane Town. The spatial strategy seeks to determine where planned growth will be directed, balanced with the priority areas for environmental protection and enhancement.

The LDP's spatial strategy and the settlement hierarchy, in accordance with guidance in the RDS and the SPPS, sets out the following strategic spatial objectives:

- Derry as the principal city, linked with Letterkenny, of an expanding North West region.
- Strabane as a main hub town.
- The rural communities to be sustained and vibrant, living in local towns, villages and small settlements, as well as the open countryside.
- Key environmental designations such as Special Countryside Area (SCAs) and Areas of High Landscape Importance (AHLIs) to protect important landscapes and proposed Green Belts around Derry and Strabane to contain urban sprawl and development pressure. The LDP will also define Development Pressure Areas, which are focused areas of development pressure in the countryside. A number of Wind Energy Capacity Areas (WECAs) are also designated to reflect certain local areas that are considered to be at or reaching capacity with wind turbines / wind farms.
- Main infrastructure features including, road infrastructure: A2 Buncrana Road to Letterkenny, A2 northwards to Coleraine, A5 to Dublin (including links into the TEN-T route from Strabane to Letterkenny) and A6 to Belfast; rail infrastructure: Derry to Belfast line, City of Derry Airport and Foyle Port.

We are **fully supportive** of the Spatial Strategy above, specifically the last point relating to main infrastructure which identifies Foyle Port as a location where planned growth will be directed. We welcome the above strategy which will enhance the Port's role as a key cross-border and international gateway.

### **Economic Development Strategy**

The Council's LDP Strategy for Economic Development aims to promote sustainable economic development through the creation of up to 15,000 jobs. This is to be done by reinforcing Derry's role as the hub of the North West City Region and strengthening cross-border links and opportunities.

The Council's LDP Strategy for Economic Development is to promote sustainable economic development in an environmentally sensitive manner and reinforcing Derry's role as the hub of the North West City Region, strengthening cross-border links and opportunities and the creation of up to 15,000 jobs. The LDP will safeguard existing employment lands and continue to focus economic development opportunities in Derry, Strabane and the local towns, in their centres, in dedicated employment areas and through other opportunities. It will promote communication lines and hubs, notably the Port and City of Derry Airport and support the important role of the University as a key economic driver. Opportunities will also be provided for the rural economy in villages, small settlements and the countryside especially through home-working, farm diversification and re-use of redundant buildings.

We **support** the safeguarding of existing employment lands and the continued focus on economic development opportunities in Derry, Strabane and the local towns, in their centres. The promotion of communication lines and hubs, at the Port is also welcomed.

However, as set out above, we **disagree** with the 15,000 jobs figure set out above, we consider that the Council should strive for 'potential growth' figures as opposed to planned growth. We would encourage the Council to provide enough land to accommodate and facilitate the provision 16,000 - 18,000 jobs. These figures more accurately reflect an ambitious growth plan for the Council.

#### Soundness Test

- The draft Plan Strategy job creation figure is not sound as it is not reasonably flexible to enable it to deal with changing circumstances i.e. unexpected growth (Test CE4) and it is not based on a robust evidence base (Test CE2). The draft Plan Strategy does not take account of the Council's 'Strategic Growth Plan' (Test C4). The projected housing growth underestimates the housing need for the district over the plan period.

#### Remedy

- Revise job creation figures and update to provide 16,000 -18,000 jobs within the district by 2032.

### **Employment Opportunity Areas - Special Economic Development Areas (SEDAs)**

Special Economic Development Areas (SEDAs) are identified within the draft Plan Strategy and Foyle Port is identified as a SEDA. It is said 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. It is said that other uses that would complement the port use and existing energy generation uses could be accommodated in this area. Further relevant planning policy is set 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 in 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 Port's Development Framework Plan); which contains businesses and industries that are directly or indirectly linked to port operations. Furthermore, Foyle Port's 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 future Port SEDA designation/zoning to cover the wider Port area as detailed in Foyle Port's Development Framework Plan.

It is currently left to the market and regional planning policy to decide what is or isn't 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 aren't zoned for industrial/employment uses) having experienced high 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 Strathfoyle 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. For example, the development of a new power station has been a welcomed addition to the port that is wholly appropriate for the area. However, other non-industrial uses have also been approved in the port area that has resulted in the expansion of existing industrial uses being hindered as a result.

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.

### **Policy ED 1 General Criteria for Economic Development**

#### **ED 1 General Criteria for Economic Development**

A proposal for an economic development use, in addition to policy provisions of ED 2 - ED 7 will be permitted when it meets all the following criteria:

- (a) it will not result in unacceptable harm to nearby residents;
- (b) it does not adversely affect features of the natural and historic environment in accordance with Chapter 21: Natural Environment and Chapter 23: Historic Environment;
- (c) it meets all relevant flooding policy criteria set out in Chapter 25: Development and Flooding;
- (d) it does not create a noise nuisance;
- (e) it is capable of dealing satisfactorily with any emission or effluent;
- (f) the existing road network can safely handle any extra vehicular traffic the proposal will generate or suitable developer led improvements are proposed to overcome any identified road problem;
- (g) adequate access arrangements, parking and manoeuvring areas are provided;
- (h) a movement pattern is provided, insofar as possible, that supports walking and cycling; meets the needs of people whose mobility is impaired; respects existing public rights of way and provides adequate and convenient access to public transport;
- (i) the site layout, building and design, associated infrastructure and landscaping arrangements are of high quality and assist the promotion of sustainability and biodiversity;
- (j) appropriate boundary treatment and means of enclosure are provided and any areas of outside storage proposed are adequately screened from public view;
- (k) it is designed to deter crime and promote personal safety; and
- (l) in the case of proposals in the countryside, there are satisfactory measures to assist integration into the landscape;
- (m) A proposal for development in the vicinity of an existing or approved economic development use is compatible with that use and does not prejudice its future operation (see ED 4 for further direction on this criteria)



We are **generally supportive** of the above policy given the importance of minimising and mitigating adverse impacts on the amenity of neighbouring properties, including residential dwellings and natural and built heritage assets. It is also important that the dPS encourages new economic development uses within appropriate locations such as Foyle Port.

### **Policy ED 3 Economic Development in Settlements**

#### **ED 3 Economic Development in Settlements**

##### **(a) City and Towns**

Proposals for B1(c) (Research and Development), Class B2 (Light Industrial), Class B3 (General Industrial), Class B4 (Storage and Distribution) and appropriate complementary uses will be permitted on:-

- (i) land zoned for such purposes in the Local Development Plan; or
- (ii) within an existing industrial area where it is **compatible** with the adjacent and nearby uses and is of a scale, nature and form in keeping with the industrial area and in the case of B4 uses, approval will not lead to a significant diminution in the industrial / employment resource both in the locality and the plan area generally;
- (iii) in areas outside (i) or (ii), small scale development will be permitted provided the scale, nature and design of the proposal are in keeping with the character and setting of the settlement and the proposal is compatible with adjacent and nearby land uses, including residential.

##### **(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.

We are **supportive** of the above policy and welcome that, within zoned and established economic development areas, there will be a presumption in favour of economic development related uses classes, unless otherwise specified in the LDP. As well as the use classes set out in ED 3 (B1(c) (Research and Development), Class B2 (Light Industrial), Class B3 (General Industrial) and Class B4 (Storage and Distribution)), there is evidence of a diverse range of appropriate uses within existing economic development areas including sui generis uses. It is important that policy is flexible enough to encourage a mix of appropriate uses which will compliment the existing uses and not hinder future development in the area.

## **Policy ED 4 Protection of Zoned and Established Economic Development Land and Uses**

### **ED 4 Protection of Zoned and Established Economic Development Land and Uses**

#### **Zoned Land in all Locations**

Development that would result in the loss of land or buildings zoned for economic development use in the LDP to other uses will not be permitted. An exception will be permitted where an essential need has been demonstrated and the proposed use is a small scale complementary / ancillary use that meets the day-to-day needs of local employees and it meets other relevant planning policies and does not lead to a significant diminution in the industrial / employment resource both in the locality and the plan area generally.

#### **Unzoned Land in Settlements**

On unzoned land, a development proposal that would result in the loss of an existing Class B2, B3 or B4 use, or land last used for these purposes, will only be permitted where it is demonstrated that it is a:

- (a) redevelopment for a Class B1 business use (other than offices) or other suitable employment use that would make a significant contribution to the local economy; or
- (b) the proposal is a specific mixed-use regeneration initiative which contains a significant element of economic development use and may also include residential or community use, and which will bring substantial community benefits that outweigh the loss of land for economic development use; or
- (c) the proposal is for the development of a compatible sui generis employment use or compatible uses of a scale, nature and form appropriate to the location and such uses are established in the location; or
- (d) the present use has a significant adverse impact on the character or amenities of the surrounding area; or
- (e) the site is unsuitable for modern industrial, storage or distribution purposes; or
- (f) an alternative use would secure the long-term future of a building or buildings of architectural or historical interest or importance, whether statutorily listed or not; or
- (g) there is a firm proposal to replicate existing economic benefits on an alternative site in the vicinity; or
- (h) where an essential need has been demonstrated, a small scale complementary / ancillary use that meets the day-to-day needs of local employees and it meets other relevant planning policies.

#### **Compatibility with Nearby Established / Approved Economic Uses**

A proposal for development in the vicinity of an existing or approved economic development use must be compatible with that use and not prejudice its future operation. This will apply to both proposals for economic or non-economic uses and applicants must demonstrate that any new proposal will not unduly compromise the future operation of an established or approved economic use.

We **fully support** the above policy as it is essential that economic development uses on zoned and unzoned sites be retained to ensure a sufficient and ongoing land supply. It will be beneficial to see at Local Policies Plan stage, the reallocation of zoned lands and the type and range of economic development uses that will be acceptable within specific zoned sites and other key strategic sites and locations will be specified.

As part of the re-evaluation of zoned industrial/employment land within the Local Policies Plan, we would encourage the Council to consider the creation of some accompanying guidance for new zonings that provides some direction regarding appropriate development types and land-uses, without overly restricting development potential in such zonings.

Overall, we agree that there is an ample quantum of economic development land for the Local Development Plan period and that existing lands need to be reviewed to ensure it is adequate and appropriately located.

We would also suggest that the Council considers a unique zoning/designation for the port area that encourages appropriate uses, such as import/export operations and associated/supporting supply chains and associated uses. Again, the Port's Development Framework Plan (a copy of which has been provided to the Council) will hopefully assist the Council when considering this suggestion.

### Policy TAM12 'Transport Facilities'

#### **TAM 12 Transport Facilities**

Planning permission may be granted for proposals necessary for the improvement of strategic transportation facilities such as regional ports and airports. Such proposals should be directly related to the transportation function of the site and meet all other relevant LDP policies. Development which is related to, and dependent on, siting adjacent to the port or airport will normally be considered acceptable unless it would result in an unacceptable loss of safety or amenity for adjacent communities or does not meet the requirements of GDPOL 1.

We are fully supportive of the above policy and the improvement of strategic transportation facilities such as regional ports, such as Foyle Port. It is welcomed that development, which is related to, and dependent on, siting adjacent to the port will be considered acceptable subject to safeguarding safety and amenity.

On page 181, the draft Plan Strategy also makes reference to consultation with Foyle Port and states that the LDP will zone at the Local Policies Plan stage, where appropriate, land for known requirements for future expansion of the Port, which is welcomed.

### Policy CD1 'Coastal Development'

#### **CD 1 Coastal Development**

The Council will require the protection or enhancement of the District's coastal area and seascape. Development proposals must comply with NE 1 and should not have an unacceptable effect, either directly, indirectly, or cumulatively, on the coastal area and its setting. Development will not normally be permitted in areas of the coast known to be at risk from flooding, coastal erosion or land instability. Development proposals will also be assessed against the UK Marine Policy Statement (MPS) and any adopted Marine Plan.\*

#### **• Undeveloped Coast \***

Development will only be permitted on the undeveloped coast where the proposal is of such national or regional importance as to outweigh any potential detrimental impact on the coastal environment and where there is no feasible alternative site within the existing developed coast in the locality. An exception to this requirement (for proposals to be of national or regional importance) is for a tourism or recreational water-based amenity where it can be demonstrated that the proposal needs to be located in a coastal or waterside location and that it is not feasible to locate within a settlement and that it is of District-scale importance and that the general public will have access.

Where development within the undeveloped coast is acceptable in principle, it must:

- Avoid unacceptable adverse impacts on the natural environment, archaeological / built heritage, geological or landscape / seascape value of the area;
- Minimise the visual impact of development by the careful siting, design and landscaping of the proposal; and
- Keep important public views of the coast free from development.

#### **• Developed Coast\***

Development proposals will be permitted on the developed coast where the proposal meets the normal Planning and Environmental criteria set out in the other relevant sections of this LDP.

Within the developed or undeveloped coast, development which would result in the closure of existing coastal access points or the severing of routes will normally only be acceptable where a suitable alternative is provided. Proposals to extend access to the coastline or for the provision of associated facilities such as pathways or picnic areas, should not impact adversely on the natural, built or archaeological / defence heritage, geological or landscape value of the area.

There will be a presumption against inappropriate development on green areas and open space along the coast within existing settlements. Appropriate development would include small-scale tourism or recreational development in association with existing open space uses. The enlargement and enhancement of existing amenity open space along the coastline within existing settlements will be encouraged. Applications for tourism and recreational schemes or caravan / chalet parks will be directed to existing urban areas, subject to the exception detailed above.

#### **• Tidal reaches of the Foyle and Faughan:**

Tidal stretches of our District's rivers, other than the inter-tidal overlap area, are not included in our developed / undeveloped coast consideration (but all will be subject to the policy requirement of NE 4 as set out in the Natural Environment Chapter 21).

\* The 'developed coast' includes existing settlements (ie within development limits) and existing major developments such as ports, isolated industrial units / areas and power stations. All other coastal areas are considered to be undeveloped coast.

We support the above policy. It is considered that there are few types of development which require a coastal location; examples in the District which are mentioned include Lisahally Port, Foyle Port Marina and port-related economic development uses. In dealing with development proposals for coastal uses / buildings in these locations, the Council will carefully assess each proposal, its effect on the local or regional economy and potential impacts on the environment, including the marine.

We welcome this approach as the Port is and will continue to play a significant role in contributing to the local or regional economy and this should be acknowledged.

In summary, Foyle Port broadly welcomes the Council's draft Plan Strategy and would encourage the Council to progress an ambitious Local Development Plan for the Derry area. We are keen to engage further with the Council regarding the port and the role it could play in the new Local Development Plan.

We look forward to receiving an acknowledgement of receipt of this submission and engaging further with the Council as the Local Development Plan progresses. If you require any further information or clarification on this submission, please contact me directly at the office.

Yours Sincerely

A solid black rectangular box redacting the signature of Lisa Shannon MRTPI.

Lisa Shannon MRTPI

(on behalf of Foyle Port)